

**RCRA HAZARDOUS WASTE FACILITY  
COMPLIANCE EVALUATION INSPECTION CHECKLIST**

Facility: LTV Steel - Cleveland East  
USEPA I.D.: OH0 004218 673 HWFB No.: 02-18-0186  
Street: 3100 East 45<sup>th</sup> Street  
City: Cleveland State: Ohio Zip: 44127  
County: Cuyahoga Telephone: (216) 429-6370  
PUCO No.: \_\_\_\_\_

Owner/Operator: \_\_\_\_\_  
Street: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Telephone: \_\_\_\_\_

Inspection Date: 1/13/91 Time: 9:30 - 4:00

Advance notice of inspection given? (yes) ☒ (no) \_\_\_\_\_  
If so, how far in advance? 2 weeks

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>Erez Taylor</u>	<u>Ohio EPA Env. Scientist</u>	<u>(216) 425-9171</u>
	<u>Marlene Emanuelson</u>	<u>Lindhagunzad, CEPA Env. Scientists</u>	<u>(216) 425-9171</u>
Facility Representative:	<u>Stan Ribtar, Tom Girdler, Ron Kaapik, Tom Harlan</u>		
	<u>Richard Nemeth</u>		

**STATUS**

Cond. Ex. SQG \_\_\_\_\_ SQG \_\_\_\_\_ Large Quantity Generator ☒  
Treatment \_\_\_\_\_ Storage ☒ Disposal \_\_\_\_\_ Transporter \_\_\_\_\_  
Part A Permit: (yes) ☒ (no) \_\_\_\_\_ Part B Permit: (yes) \_\_\_\_\_ (no) ☒  
LDR Checklist Attached: (yes) ☒ (no) \_\_\_\_\_

**ACTIVITIES**

Containers <input checked="" type="checkbox"/>	Used oil burner _____
Tanks <input checked="" type="checkbox"/>	Hazardous waste fuel burner/blender _____
Wastepile _____	Incineration/Thermal treatment _____
Landfill _____	Land treatment _____
Surface Impoundment _____	Groundwater monitoring _____

Revised: 1/7/91

## REMARKS - GENERAL INFORMATION

Include list of wastes being managed at the site and a brief description of site activity and waste handling procedures:

Integrated Steel plant producing zinc coated sheets and coils; bar products, hot rolled coil and strip; cold rolled coil and strip

BOF Dust - Basic Oxygen Furnance dust - D008 - Disposal - Wayne Michigan

K062 - Pickle liquor - disposed of by Eaglebrook of Ohio Inc. (Cleveland)

F001 - Degreasing Solvent - Tetrachlorethylene is disposed of through Chemtron (Aven Oh)

D001 - Parts washers serviced by Safety-Kleen, also includes D018 + D039.

K087 - Coal Tar - closed loop recycling.

## FACILITY INSPECTION WASTE MANAGEMENT ACTIVITIES SUMMARY

### DESCRIPTION OF WASTE

## ON SITE MANAGEMENT

## OFF SITE MANAGEMENT

[illegible]

PERMIT STATUS

Y/N/NA RMK#

1. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?

Y       

When was the facility's Part A submitted:

11/18/80

2. Is the facility operating in compliance with the terms conditions of its HWFB permit?

Y       

If not, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51?

If yes, what date was the PCR submitted?                     

3. Has the facility submitted a Part B?

N       

REMARKS - PERMIT STATUS



OAC 3745-65-et seq. GENERAL FACILITY STANDARDS

IDENTIFICATION NUMBER (OAC 3745-65-11)

Y/N/NA RMK #

1. Has the facility owner/operator notified U.S. EPA of hazardous waste activity and obtained a U.S. EPA identification number [OAC 3745-65-11]?

Y \_\_\_\_\_

ANNUAL REPORT REQUIREMENT (OAC 3745-65-75)

2. Has the owner/operator submitted an annual Treatment-Storage-Disposal Operating Report to the Director of the Ohio EPA by March 1st of each calendar year? [3745-65-75]

Y \_\_\_\_\_

WASTE ANALYSIS/WASTE ANALYSIS PLAN (OAC 3745-65-13)

3. Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat, store or dispose of the waste as required by 3745-65-13 (A) (1)?
4. Is the waste analysis repeated when a process or operation generating hazardous waste changes? [3745-65-13 (A) (3) (a)]
5. For off-site facilities; Is the waste analysis repeated when results of inspections under 3745-65-13 (A) (4) reveal hazardous waste received at the facility does not match the waste designated on the accompanying manifest? [3745-65-13 (A) (3) (b)]
6. Does o/o have a written waste analysis plan which includes the following information [OAC 3745-65-13 (B) (1) through (6)]:
- a. The parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [3745-65-13 (B) (1)]
- b. The test methods to be used? [3745-65-13 (B) (2)]
- c. The sampling method which will be used, either one of the sampling methods described in Appendix I of 3745-51-20 or an equivalent method as defined in OAC 3745-50-10? [3745-65-13 (B) (3) (a) (b)]
- d. The frequency with which the initial analysis of the waste will be reviewed/repeated to ensure that the analysis is accurate and up-to-date? [3745-65-13 (B) (4)]

Y \_\_\_\_\_

NA \_\_\_\_\_

NA \_\_\_\_\_

Y \_\_\_\_\_

NA \_\_\_\_\_

Y \_\_\_\_\_

Y \_\_\_\_\_

Y/N/NA RMK ‡

e. FOR OFF-SITE FACILITIES: The waste analysis that hazardous waste generators have agreed to supply? [3745-65-13(B)(5)]

NA \_\_\_\_\_

f. FOR OFF-SITE FACILITIES: The sampling methods and procedures which will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-65-13(C)]?

NA \_\_\_\_\_

g. FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER 3745-59-04(A):

NA \_\_\_\_\_

Does the waste analysis plan include procedures and schedules for:

- i. The sampling of impoundment contents? [3745-65-13(B)(7)]
- ii. The analysis of test data? [3745-65-13(B)(7)]
- iii. The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either do not meet treatment standards (3745-59-44) or where no treatment standards have been established? [3745-65-13-(7)]

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

h. Where applicable: The methods which will be used to meet the additional waste analysis requirements of rules 3745-59-07, 3745-67-25, 3745-67-52, 3745-67-73, 3745-68-14, 3745-68-41, 3745-68-75 and 3745-69-02 of the OAC? [3745-65-13(B)(6)]

NA \_\_\_\_\_

REMARKS - WASTE ANALYSIS REQUIREMENTS

OPERATING RECORD REQUIREMENTS (OAC 3745-65-73)

Y/N/NA RMK #

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES. -

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) which contains the following information:
  - a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B) (1)]
  - b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?
  - c. The estimated (or actual) weight, volume or density of the waste material?
  - d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745?
  - e. The present physical location of each hazardous waste within the facility and cross references to specific manifest document numbers?
  - f. Records of incidents which required implementation of the Contingency Plan?
  - g. Records of any waste analyses and trial tests required to be performed?
  - h. Records of the inspections required under the General Inspection Requirements under 3745-65-15?
  - i. Records of any monitoring, or analytical data required under other Subparts as referenced by 3745-65-73(B) (6)?
  - j. **FOR DISPOSAL FACILITIES**, location and quantity of each hazardous waste recorded on a facility map and cross-references to manifest document numbers? [3745-65-73(B) (2)]
  - k. Records of closure cost estimates ~~and post-closure~~ ~~(DISPOSAL ONLY)~~ cost estimates required by OAC 3745-66?

Y \_\_\_\_\_

NA \_\_\_\_\_

Y \_\_\_\_\_

NA \_\_\_\_\_

NA \_\_\_\_\_

Y \_\_\_\_\_

Y \_\_\_\_\_

Y \_\_\_\_\_

NA \_\_\_\_\_

NA \_\_\_\_\_

Y \_\_\_\_\_

NOTE: THE FOLLOWING RECORDKEEPING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

Y/N/NA RMK #

- |    |  |           |       |
|----|--|-----------|-------|
| 2. | Are manifests received by the facility signed and dated?<br>[3745-65-71(A) (1)]  | <u>NA</u> | _____ |
| 3. | Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)]  | <u>NA</u> | _____ |
| a. | If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)]?  | _____     | _____ |
| b. | Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) noted in writing on the manifest document?  | _____     | _____ |
| 4. | Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) or has the o/o submitted the required information to the Director?   | <u>NA</u> | _____ |
| 5. | If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) been submitted to the Director within 15 days? | <u>NA</u> | _____ |

REMARKS - OPERATING RECORD REQUIREMENTS

GENERAL INSPECTION REQUIREMENTS (OAC 3745-65-15)

Y/N/NA RMK #

1. Does the o/o inspect the facility on a weekly basis for malfunctions, deterioration, operator errors and discharges which may cause a release of hazardous waste or hazardous waste constituents or may pose a threat to human health? [3745-65-15(A) (1) (2)] If so,

Y —

a. Are the inspections recorded in an inspection log or summary as required by 3745-65-15(D)? [3745-65-15(A)]

Y —

b. Do records contain date and time of inspection, name of inspector, notation of observations made and date and nature of any repairs or remedial actions as required by 3745-65-15(D)? [3745-65-15(A)]

Y —

c. Are inspection records maintained at the facility for at least (3) years as required by 3745-65-15(D)? [3745-65-15(A)]

Y —

2. Has the owner/operator developed a written inspection schedule for inspecting; monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment (e.g. dikes, sumps)? [3745-65-15(B)] If so,

\* N —

a. Is the schedule kept at the facility? [3745-65-15(B) (2)]

Y —

b. Does the schedule identify the types of problems which are to be looked for during the inspection? [3745-65-15(B) (3)]

Y —

c. Does the schedule include inspection of areas subject to spills (i.e. loading and unloading areas) daily when in use and according to other applicable regulations when not in use? [3745-65-16(B) (4)]

Y —

REMARKS - GENERAL INSPECTION REQUIREMENTS

\* Inspection schedule needs to include emergency equipment.

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

1. Does the facility provide a Personnel Training Program in compliance with 3745-65-16(A) (B) (C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan?
2. Does the facility provide Personnel Training to new employees within 6 months after the date of their employment as required by 3745-65-16(B)?
3. Does the facility provide an annual training program refresher course as required by 3745-65-16(B)?
4. Does the facility keep all of the records required by 3745-65-16(D) (E) including written job titles, job descriptions and documented employee training records?

Y    \_\_\_\_\_

Y    \_\_\_\_\_

Y    \_\_\_\_\_

Y    \_\_\_\_\_

REMARKS - PERSONNEL TRAINING

CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)

Y/N/NA RMK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components: [3745-65-52(A) (B) (C) (D) (E)]

a. Actions to be taken by personnel in the event of an emergency?

Y \_\_\_\_\_

b. Arrangements or agreements with local or state emergency authorities?

Y \_\_\_\_\_

c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?

Y \_\_\_\_\_

d. A list of all emergency equipment including location, physical description and outline of capabilities?

Y \_\_\_\_\_

e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)]?

NA \_\_\_\_\_

2. Is the Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51(A)]

Y \_\_\_\_\_

3. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has the plan been submitted to all local and state emergency authorities that might be required to participate in execution of the plan? [3745-65-53(A) (B)]

Y \_\_\_\_\_

4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54]

Y \_\_\_\_\_

5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-55]

Y \_\_\_\_\_

Y/N/NA REMARK #

6. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications necessary under 3745-65-56 (A-J)?

~~\_\_\_\_\_~~ \_\_\_\_\_

REMARKS - CONTINGENCY PLAN REQUIREMENTS



PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] Y \_\_\_\_\_
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection? Y \_\_\_\_\_
  - a. If yes, was the contingency plan implemented? [3745-65-51(B)] Y \_\_\_\_\_
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A) (B) (C) (D)]
  - a. Internal alarm system? Y \_\_\_\_\_
  - b. Access to telephone, radio or other device for summoning emergency assistance? Y \_\_\_\_\_
  - c. Portable fire control equipment, spill control and decontamination equipment? Y \_\_\_\_\_
  - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers? Y \_\_\_\_\_
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33] NA \_\_\_\_\_
  - a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs? NA \_\_\_\_\_
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device? [3745-65-34] Y \_\_\_\_\_
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35] Y \_\_\_\_\_
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)] NA \_\_\_\_\_

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented?  
[OAC 3745-65-37(B)]

NA \_\_\_\_\_

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

SECURITY REQUIREMENTS (OAC 3745-65-14)

Y/N/NA RMK #

1. a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)]
- b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)]

Y —  
Y —

IF BOTH 1A AND 1B ARE NO, MARK QUESTIONS 2 AND 3 NOT APPLICABLE.

2. Does the facility have -

- a. A 24-hour surveillance system, or;
- b. An artificial or natural barrier and a means to control entry at all times? [3745-65-14(B)(2)(a)(b)]

Y —  
Y —

3. Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary? [3745-65-14(C)]

Y —

REMARKS - SECURITY REQUIREMENTS

SPECIAL REQUIREMENTS FOR IGNITABLE/REACTIVE/INCOMPATIBLE  
WASTES (OAC 3745-65-17)

Y/N/NA RMK #

1. If ignitable, reactive or incompatible wastes are handled,  
does the facility meet the following requirements?  
[3745-65-17]

- a. Wastes are protected from sources of ignition and/or  
reaction? NA \_\_\_\_\_
- b. Physical separation of incompatible waste materials? \_\_\_\_\_
- c. "No Smoking" or "No Open Flames" signs are placed  
near areas where ignitable or reactive wastes are  
handled? \_\_\_\_\_
- d. Commingling of waste materials is done in a controlled,  
safe manner as prescribed by 3745-65-17(B)? \_\_\_\_\_

REMARKS - IGNITABLE/REACTIVE/INCOMPATIBLE WASTE REQUIREMENTS

Dool wastes are not stored on site, the liquid is removed from the  
parts washer and then shipped off-site.

SPECIAL REQUIREMENTS  
IGNITABLE/REACTIVE/INCOMPATIBLE WASTES

OAC 3745-66 CLOSURE AND POST CLOSURE

- |   | Y/N/NA     | RMK # |
|---|------------|-------|
| 1. Is a written closure plan on file at the facility which contains the following elements: [3745-66-12]?   | <u>Y</u> * | _____ |
| a. A description of how each hazardous waste management unit will be closed in accordance with 3745-66-11?  | <u>Y</u>   | _____ |
| b. A description of how final closure will meet the requirements of 3745-66-11?   | <u>Y</u>   | _____ |
| c. An estimate of the maximum amount of hazardous waste ever in inventory?  | <u>Y</u>   | _____ |
| d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues?   | <u>Y</u>   | _____ |
| e. The year closure is expected to begin and a schedule for the various phases of closure?  | <u>Y</u>   | _____ |
| f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control?  | <u>NA</u>  | _____ |
| 2. Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)]  | <u>NA</u>  | _____ |
| 3. Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director 180 days prior to beginning the closure process? [3745-66-12(D)]  | <u>NA</u>  | _____ |
| 4. Has the closure plan (and post-closure plan, if applicable) for tank, container storage or incinerator units been submitted to the Director 45 days prior to beginning the closure process? [3745-66-12(D)]  | _____      | _____ |
| 5. Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)]  | _____      | _____ |
| 6. Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)]   | _____      | _____ |
| 7. Did the owner/operator submit to the Director, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] | _____      | _____ |

8. Did the owner/operator submit to the local zoning authority and the Director a survey plat in accordance with OAC 3745-66-16? \_\_\_\_\_
9. What permitted units at the facility have been closed in accordance with an approved Closure Plan?  
\_\_\_\_\_  
\_\_\_\_\_
10. If closure was partial, list the regulated units which remain in use at the facility:  
\_\_\_\_\_  
\_\_\_\_\_
11. If required, has the facility prepared a written post-closure plan? [3745-66-18] \_\_\_\_\_
- If so, does the post-closure plan include:
- a. A description of proposed ground water monitoring? \_\_\_\_\_
- b. A description of planned maintenance activities? \_\_\_\_\_
- c. The name, address and phone number of person/office to contact during the post-closure period? \_\_\_\_\_
12. For disposal facilities; has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] \_\_\_\_\_
13. Has the owner of the property on which a disposal unit is located recorded on the deed that:  
\_\_\_\_\_
- a. The land has been used to manage hazardous waste and the type, quantity and location of waste? \_\_\_\_\_
- b. Land use is restricted under closure and post-closure rules? [3745-66-19] \_\_\_\_\_

## REMARKS - CLOSURE/POST CLOSURE REQUIREMENTS

\* Several waste management units are presently undergoing closure, these include 60" Electroplate line Tanks, 84" Pickle line Tanks and degreaser sludge container.

RCRA HAZARDOUS WASTE GENERATOR  
COMPLIANCE EVALUATION INSPECTION CHECKLIST

Facility: LTV Steel - Cleveland East

USEPA I.D.: OHID 004 218673 HWFB No.: 02-18-0186

Street: 3100 East 45<sup>th</sup> Street

City: Cleveland State: Ohio Zip: 44127

County: Cuyahoga Telephone: (216) 429-6370

Owner/Operator: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_

Inspection Date: 1/31/91 Time: 9:30 - 4:00

Advance notice of inspection given? (yes) ☒ (no) \_\_\_\_\_

If so, how far in advance? 2 weeks

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>Greg Taylor, Marlene Emanuelson, Linda Lagunza</u>		
	<u>Ohio EPA Env. Scientist 425-9171</u>		
Facility Representative:	<u>Stan Richter, Tom Girdler, Ron Knapik, Tom Harlan</u>		
	<u>Richard Nemeth</u>		

STATUS

Cond. Exempt SQG \_\_\_\_\_ SQG \_\_\_\_\_ Large Quantity Generator ☒

IDR Checklist Attached: (yes) ☒ (no) \_\_\_\_\_

ACTIVITIES

Containers <input checked="" type="checkbox"/>	Used oil burner _____
Tanks <input checked="" type="checkbox"/>	Hazardous waste fuel burner/blender _____
Wastepile _____	Incineration/Thermal treatment _____
Landfill _____	Land treatment _____
Surface Impoundment _____	Groundwater monitoring _____

Revised: 1/7/91

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling procedures:



# FACILITY INSPECTION WASTE MANAGEMENT ACTIVITIES SUMMARY

## DESCRIPTION OF WASTE

## ON SITE MANAGEMENT

## OFF SITE MANAGEMENT

[illegible]

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

(yes) \_\_\_\_\_ (no) ✓

If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

(yes) \_\_\_\_\_ (no) ✓

If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

OR;

- b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

(yes) ✓ (no) \_\_\_\_\_

If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

OAC 3745-52 - LARGE QUANTITY GENERATOR REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have wastes generated at the facility been evaluated in compliance with the waste evaluation requirements of OAC rule 3745-52-11(A) (B) and (C)?

Y \_\_\_\_\_

If not, specify those waste streams which the generator has failed to adequately evaluate:

2. Are any wastes generated at the facility identified by the generator as being excluded from regulation under Rule 3745-51-04?

N \_\_\_\_\_

If so, specify those waste streams identified by the generator as being excluded under 3745-51-04:

3. Is the facility generating any wastes which are identified as recyclable materials as defined in OAC 3745-51-06?

Y \_\_\_\_\_

If so, please identify these waste streams below:

K087-Coal Tar decanter sludge.

4. Is the generator recycling any materials on-site by:
- Using or reusing the material as an ingredient in an industrial process to make a product?
    - If so, is the material being reclaimed before it is used or reused?
  - Using the material as a substitute for commercial products?
  - Returning the material to the original process from which it was generated as a substitute for a raw material feedstock?
    - If so, is the material reclaimed before returning to the original process?

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
Y \_\_\_\_\_  
N \_\_\_\_\_

Please identify those materials that the generator is recycling as described in 4.a., 4.b. and/or 4.c. below:

K087- Coal Tar decanter sludge

5. Has the generator identified any waste treatment activity as being excluded from regulation because of totally enclosed treatment or via operation of an elementary neutralization unit and/or wastewater treatment unit as described in Rule 3745-65-01?

N \_\_\_\_\_

If so, specify those waste treatment activities which the generator has identified as being excluded from regulation:

6. Are Land Disposal Restricted (LDR) wastes being generated? If so, complete the Land Disposal Restriction Checklist.

Y \_\_\_\_\_

**GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)**

7. Prior to treating, storing, disposing, transporting or offering to transport hazardous waste, has the generator obtained a generator identification number from USEPA as required by 3745-52-12?

Y \_\_\_\_\_

**GENERATOR ANNUAL REPORT (OAC 3745-52-41)**

8. Has the generator filed annual reports to the Director on or before March 1st of each calendar year as required by 3745-52-41?

Y \_\_\_\_\_

HAZARDOUS WASTE IMPORT/EXPORT (OAC 3745-52-50 TO 3745-52-57  
AND OAC 3745-52-60)

Y/N/NA RMK #

9. Does the generator import or export hazardous waste?

N \_\_\_\_\_

If so, are the wastes handled in accordance with the  
requirements of 3745-52-50 through 3745-52-57 and  
3745-52-60?

NA \_\_\_\_\_

REMARKS - HAZARDOUS WASTE IMPORT/EXPORT

PRE-TRANSPORT REQUIREMENTS (OAC 3745-52-30 TO 3745-52-33)

Y/N/NA RMK #

10. Does the generator meet the following pre-transport  
requirements prior to offering hazardous wastes for  
transport off-site:

- a. The waste material is packaged, labeled, and marked  
in accordance with the applicable DOT regulations  
[3745-52-30, 3745-52-31, and 3745-52-32]?
- b. Each container with a capacity of 110 gallons or less  
is affixed with a completed hazardous waste label as  
required by 3745-52-32?
- c. The generator meets the requirements for proper DOT  
placarding or offers the appropriate DOT placards to  
the initial transporter in compliance with 3745-52-33?

Y \_\_\_\_\_

Y \_\_\_\_\_

Y \_\_\_\_\_

REMARKS - PRETRANSPORT REQUIREMENTS

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
  - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20 (A)?
  - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22?
  - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20 (C) (D) (E)?
  - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A) (1) (2)?
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter?
  - a. If not, has the generator complied with the Manifest Exception reporting requirements in 3745-52-42?
3. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40?

Y \_\_\_\_\_

Y \_\_\_\_\_

Y \_\_\_\_\_

Y \_\_\_\_\_

Y \_\_\_\_\_

NA \_\_\_\_\_

Y \_\_\_\_\_

REMARKS - MANIFEST REQUIREMENTS

GENERATOR CLOSURE REQUIREMENTS (3745-52-34)

Y/N/NA RMK #

1. Has the generator closed any < 90-day accumulation unit(s) since date of last inspection?   N

If so, describe the unit(s) which the generator has closed:

2. If the generator has closed any < 90-day accumulation unit(s) as described in Question #1, was closure completed to meet the closure performance standard of 3745-66-11? [3745-52-34(A) (1)]   NA

Please provide a description of the type of documentation provided by the generator to confirm that closure was completed in accordance with the closure performance standard:

REMARKS - GENERATOR CLOSURE REQUIREMENTS

PERSONNEL TRAINING (OAC 3745-65-16)

Y/N/NA RMK #

1. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A) (B) (C) including instruction in safe equipment operation and emergency procedures, and implementation of the contingency plan? [3745-52-34(A) (4)]
2. Does the generator provide Personnel Training to new employees within 6 months after the date of employment as required by 3745-65-16(B)? [3745-52-34(A) (4)]
3. Does the generator provide an annual refresher training course as required by 3745-65-16(B)? [3745-52-34(A) (4)]
4. Does the generator keep all the records required by 3745-65-16(D) (E) including; written job titles, job descriptions and documented employee training records? [3745-52-34(A) (4)]

Y —

Y —

Y —

Y —

REMARKS - PERSONNEL TRAINING REQUIREMENTS



CONTINGENCY PLAN (OAC 3745-65-50 THROUGH 3745-65-56)

Y/N/NA RMK #

1. Does the o/o have a written Contingency Plan which contains the following? [3745-65-52(A) (B) (C) (D) (E)]:
  - a. Actions to be taken by personnel in the event of an emergency incident?
  - b. Arrangements or agreements with local or state emergency authorities?
  - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?
  - d. A list of all emergency equipment including location, physical description and outline of capabilities?
  - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)]?
2. Is the Contingency Plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste or hazardous waste constituents to air, soil or surface water? [3745-65-51(A)]
3. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in execution of the plan? [3745-65-53(A) (B)]
4. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54]
5. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-55]

Y —

Y —

Y —

Y —

Y —

Y —

Y —

Y —

Y —

Y/N/NA    RMK #

6.    If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications necessary under 3745-65-56 (A-J) ?

~~Y~~    —

REMARKS - CONTINGENCY PLAN REQUIREMENTS

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] Y —
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection? Y —
  - a. If yes, was the contingency plan implemented? [3745-65-51(B)] Y —
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A) (B) (C) (D)]
  - a. Internal alarm system? Y —
  - b. Access to telephone, radio or other device for summoning emergency assistance? Y —
  - c. Portable fire control equipment, spill control and decontamination equipment? Y —
  - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers? Y —
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33] NA —
  - a. Does the facility keep an equipment testing log required by 3745-65-33(B), including date and time of test, observations made, and date and nature of any repairs? NA —
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] Y —
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35] Y —
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37(A)] NA —

Y/N/NA RMK #

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented?  
[OAC 3745-65-37(B)]

NA \_\_\_\_\_

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

STORAGE AND TREATMENT IN TANKS (OAC 3745-66-91 TO 3745-66-991)

**NOTE:** Tanks used to store or treat wastes containing no free liquids (as determined by the Paint Filter Liquid Test) that are located inside a building with an impermeable floor are exempt from secondary containment requirements of 3745-66-93. Tank systems including sumps that serve as part of a secondary containment system are also exempt from 3745-66-93.

For generators who store wastes in tanks for less than 90 days use all items except 24. Compliance with the closure requirement of 3745-66-97(C) and the waste analysis requirement of 3745-66-991 is not required.

**NEW TANK SYSTEM** - Installation commencing after July 14, 1986.

**EXISTING TANK SYSTEM** - Installation or operation commencing on or before July 14, 1986.

Y/N/NA RMK #

1. Is the generator operating any of the following classifications of tank systems for the management of hazardous waste(s):

- a. New tank system(s)? If so, \_\_\_\_\_

Did the o/o install secondary containment meeting the requirements of 3745-66-93 for the unit(s) prior to putting each into service? [3745-66-93(A) (1)] \_\_\_\_\_

- b. Existing tank system(s) used to manage: F020, F021, F022, F023, F026 or F027 hazardous wastes? If so, \_\_\_\_\_

Did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the tank by January 12, 1989? [3745-66-93(A) (2)] \_\_\_\_\_

- c. Existing tank system(s) of known, documentable age? ~~Y~~ \_\_\_\_\_

- i. If so, has the tank reached 15 years of age?  
(yes) ✓ (no) \_\_\_\_\_

If the answer to 1.c.i. above is no, the tank is not required to have secondary containment until the unit reaches 15 years of age.

If the answer to 1.c.i. above is no, when is the unit required to have secondary containment?

\_\_\_\_\_  
If the answer to 1.c.i. above is yes, did the o/o provide secondary containment for the unit when it reached 15 years of age or; by January 12, 1989 (whichever came later)? [3745-66-93(A) (3)] ~~Y~~ \_\_\_\_\_

- d. Existing tank system(s) for which the age cannot be documented? If so, NA

- i. Is the facility greater than 7 years of age?  
(yes) \_\_\_\_\_ (no) \_\_\_\_\_

If the facility is < 7 years of age, secondary containment for the tank is not required until January 12, 1995.

- ii. If the facility is > 7 years of age, is the facility also > 15 years of age?

(yes) \_\_\_\_\_ (no) \_\_\_\_\_

If the answer to 1.d.ii above is no, the o/o is not required to provide secondary containment for the tank until the facility reaches 15 years of age.

If the answer to 1.d.ii above is no, when is the secondary containment required for the tank(s)?

\_\_\_\_\_

If the answer to 1.d.ii. above is yes, did the o/o provide secondary containment for the tank when the facility reached 15 years of age or; by January 12, 1989 (whichever came later)? [3745-66-93(A) (4)] \_\_\_\_\_

2. Is the o/o operating a tank system which is used to manage a material that became a hazardous waste after January 12, 1987? If so, NA

- a. Has the o/o provided secondary containment meeting the requirements of 3745-66-93 for the unit as required in questions 1.a. through 1.d.? (NOTE: The date the material became a hazardous waste must be used in place of January 12, 1989) [3745-66-93(A) (5)] NA

3. Has the owner/operator obtained a variance from secondary containment requirements of 3745-66-93 from Director in accordance with 3745-66-93(G) (1)? NA

Note: If the tank system has no secondary containment, or a variance from secondary containment requirements has been granted, skip to page 9 of this Tank Systems Checklist.

4. Is the secondary containment provided for the tank system one of the following, as described in 3745-66-93:

a. External Liner? If so,

1. Is the liner designed or operated to contain 100% of the capacity of the largest tank within its boundary? [3745-66-93(1)(a)]
2. Is the liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? [3745-66-93(1)(b)]
3. Is the liner free of cracks and gaps? [3745-66-93(1)(c)]
4. Does the liner completely surround the tank and cover all earth likely to be contacted by waste during a release? [3745-66-93(1)(d)]

\*\* Is the liner concrete? If so,

5. Are chemically resistant water stops in place at all joints?
6. Is there a compatible interior coating or lining to prevent migration of waste into the concrete?

\*\* NOTE: Federal Register Preamble language (Sept. 2, 1988 FR pp. 34084) specifies that concrete liner systems must also be provided with chemical resistant water stops and compatible interior coating.

b. Vault System? If so,

1. Is the vault system designed to contain 100% of the capacity of the largest tank within its boundary? [3745-66-93(2)(a)]
2. Is the vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? [3745-66-93(2)(b)]
3. Are chemically resistant water stops in place at all joints? [3745-66-93(2)(c)]

Y/N/NA RMK #

4. Is there a compatible interior coating to prevent migration into the concrete? [3745-66-93(2)(d)]

Y \_\_\_\_\_

5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent against the formation or ignition of vapors? [3745-66-93(2)(e)]

NA \_\_\_\_\_

6. Is the vault system provided with an exterior moisture barrier? [3745-66-93(2)(f)]

NA \_\_\_\_\_

c. Doubled-Walled Tank? If so, \_\_\_\_\_

1. Is the doubled-walled tank designed as an integral structure to contain any release from the inner tank? [3745-66-93(3)(a)]

\_\_\_\_\_

2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion? [3745-66-93(3)(b)]

\_\_\_\_\_

3. Is the double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time? [3745-66-93(c)]

\_\_\_\_\_

5. Is the secondary containment system for the tank(s) an equivalent device as described in 3745-66-93(D)(4) which has been approved by the Director? [3745-66-93(D)(E)]

\_\_\_\_\_

REMARKS - SECONDARY CONTAINMENT REQUIREMENTS



SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION  
(OAC 3745-66-93 (B) (C))

Y/N/NA RMK #

6. Has each secondary containment system been designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids? [3745-66-93 (B)]

Y —

7. Does the secondary containment system meet the following minimum requirements of 3745-66-93 (C) :

a. Is it constructed or lined with compatible materials of sufficient strength to prevent failure?  
[3745-66-93 (C) (1)]

Y —

b. Is it placed on a foundation or base capable of providing support? [3745-66-93 (C) (2)]

Y —

c. Is it provided with a leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste within 24 hours or at earliest practicable time? [3745-66-93 (C) (3)]

Y —

d. Is it sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation?  
[3745-66-93 (C) (4)]

Y —

e. Is any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner?  
[3745-66-93 (C) (4)]

Y —

REMARKS - SECONDARY CONTAINMENT REQUIREMENTS

ANCILLARY EQUIPMENT REQUIREMENTS (OAC 3745-66-93(F))

Y/N/NA RMK #

8. Is tank system ancillary equipment provided with secondary containment such as double-walled piping, jacketing or trench? [3745-66-93(F)]

N \_\_\_\_\_

9. If the answer to #8 is NO, is ancillary equipment:

a. Inspected daily? AND;

Y \_\_\_\_\_

b. Is ancillary equipment one of the following;

i. Above ground piping (exclusive of flanges, joints, valves and connections)?

Y \_\_\_\_\_

ii. Welded flanges, welded joints and/or welded connections?

\_\_\_\_\_

iii. Sealless or magnetic coupling pumps and/or sealless valves?

\_\_\_\_\_

iv. Pressurized above ground piping systems with automatic shut-off devices (e.g. excess flow check valves, flow metering shutdown devices, and/or loss of pressure-actuated shut-off devices)?

\_\_\_\_\_

REMARKS - ANCILLARY EQUIPMENT REQUIREMENTS

NEW TANK SYSTEM REQUIREMENTS (OAC 3745-66-92)

Y/N/NA RMK #

1. For new tank systems has the o/o obtained a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)]

NA \_\_\_\_\_

Does the written assessment meet the following requirements of OAC 3745-66-92:

- a. Has the assessment been certified by an independent, registered, Professional Engineer? [3745-66-92(A)] \_\_\_\_\_
- b. Does the assessment include consideration of the design standards of the system? [3745-66-92(A) (1)] \_\_\_\_\_
- c. Does the assessment include consideration of the hazardous characteristics of the waste(s) to be handled? [3745-66-91(A) (2)] \_\_\_\_\_
- d. If the external system or components of the system are metal, does the assessment include a evaluation of the system by a corrosion expert to determine the potential of system corrosion? [3745-66-96(A) (3)] \_\_\_\_\_
- e. For underground tank components, does the written assessment include a determination of design and operational measures that will be needed to protect the tank system from potential damage? [3745-66-96(A) (4)] \_\_\_\_\_
- f. Does the assessment include design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-96(A) (5) (a)] \_\_\_\_\_
- g. For tanks situated in a seismic fault zone or saturated zone, does the assessment include design considerations for anchoring the unit to prevent floatation? [3745-66-96(A) (5) (b)] \_\_\_\_\_
- h. Does the assessment include design considerations to ensure that the tank system will withstand the effects of frost heave? [3745-66-96(A) (5) (c)] \_\_\_\_\_

REMARKS - NEW TANK SYSTEM ASSESSMENT REQUIREMENTS

2. Does the o/o have on file at the facility, written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)]

NA \_\_\_\_\_

Do the written statements address all of the following requirements of 3745-66-92(G):

- a. Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)] \_\_\_\_\_
- b. A statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)]? \_\_\_\_\_
- c. Proper backfilling? [3745-66-92(C)] \_\_\_\_\_
- d. Tightness test; if the tank was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)] \_\_\_\_\_
- e. Proper support and protection of ancillary equipment? [3745-66-92(E)] \_\_\_\_\_
- f. Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)] \_\_\_\_\_

REMARKS - NEW TANK SYSTEM REQUIREMENTS

TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT (OAC 3745-66-91)

Y/N/NA RMK #

1. For existing tank system, without secondary containment that meets 3745-66-93 standards, does the o/q have a written assessment of the tank system on file at the facility which meets all of the following requirements: [3745-66-91(A) (B)]

a. Design standards have been considered?  
[3745-66-91(B) (1)]

NA \_\_\_\_\_

b. The characteristics of hazardous waste(s) that have been or will be handled have been considered?  
[3745-66-91(B) (2)]

\_\_\_\_\_

c. Corrosion protection measures have been considered?  
[3745-66-91(B) (3)]

\_\_\_\_\_

d. The age of the tank system has been estimated or documented? [3745-66-91(B) (4)]

\_\_\_\_\_

e. A leak test for non-enterable underground tanks has been conducted? [3745-66-91(B) (5) (a)]

\_\_\_\_\_

f. A leak test or an internal inspection by qualified P.E. for other than non-enterable underground tanks has been conducted? [3745-66-91(B) (5) (b)]

\_\_\_\_\_

g. Is the assessment certified by an independent, registered, Professional Engineer? [3745-66-91(A)]

\_\_\_\_\_

2. Have the tests specified in 1e and 1f been conducted annually until secondary containment is provided?  
[3745-66-93(I) (4)]

NA \_\_\_\_\_

3. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the o/o done the assessment within 12 months after the date the waste became a hazardous waste? [3745-66-91(C)]

NA \_\_\_\_\_

REMARKS - TANK SYSTEMS WITHOUT SECONDARY CONTAINMENT

# TANK SYSTEM - GENERAL OPERATING REQUIREMENTS

Y/N/NA RMK #

1. Does the o/o follow the general operating requirements below: [3745-66-94]

a. Does the o/o prevent the placement of hazardous waste or treatment reagents in the tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94 (A)]

NA \_\_\_\_\_

b. Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, high level alarms)? [3745-66-94 (1) (2)]

Y \_\_\_\_\_

c. Has the o/o complied with 3745-66-96 when a leak or spill has occurred? [3745-66-94 (C)]

N \_\_\_\_\_

## TANK SYSTEM - INSPECTION REQUIREMENTS

2. Has the o/o documented the inspections required in 3745-66-95, in the operating record of the facility, including inspection of the following:

a. Spill control equipment (daily)? [3745-66-95 (A) (1)]

Y \_\_\_\_\_

b. Above ground portion of tank <sup>system</sup> (daily)? [3745-66-95 (A) (2)]

N \_\_\_\_\_

c. Data from leak detection equipment (daily)? [3745-66-95 (A) (3)]

NA \_\_\_\_\_

d. Construction materials and area immediately surrounding the tank for signs of erosion or release of hazardous waste (daily)? [3745-66-95 (A) (4)]

Y \_\_\_\_\_

e. The cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95 (B) (1)]

NA \_\_\_\_\_

f. All sources of impressed current at least bi-monthly? [3745-66-95 (B) (2)]

NA \_\_\_\_\_

## REMARKS - TANK SYSTEM GENERAL OPERATING AND INSPECTION REQUIREMENTS

ANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES  
(OAC 3745-66-98 AND 3745-66-99)

Y/N/NA RMK #

1. For tanks used to treat or store ignitable or reactive wastes,  
has the o/o complied with one of the following: [3745-66-98(A)]

- a. Is the waste treated immediately after placement in the  
tank so that the resultant mixture is no longer ignitable  
or reactive and the o/o has conducted such activities  
in compliance with 3745-65-17(B)? [3745-66-98(A) (1)]

NA \_\_\_\_\_

OR;

- b. Is the waste stored or treated to protect it from  
materials or conditions which may cause ignition or  
reaction? [3745-66-98(A) (2)]

\_\_\_\_\_

OR;

- c. The tank is used solely for emergencies?  
[3745-66-97(A) (3)]

\_\_\_\_\_

2. If ignitable or reactive waste is stored or treated, are  
protective distances maintained between waste management  
areas and any public streets, alleys or adjoining property  
lines as required by the NFPA flammable or combustible code  
(1977 or 1981)? [3745-66-98(B)]

NA \_\_\_\_\_

3. Has the o/o placed incompatible wastes or materials  
into the same tank system or into a tank system that  
has not been decontaminated and which previously held  
an incompatible waste or material [3745-66-99]?

NA \_\_\_\_\_

- a. If so, have the requirements of 3745-65-17(B) been  
met?

\_\_\_\_\_

REMARKS - IGNITABLE/INCOMPATIBLE WASTE REQUIREMENTS

TANK SYSTEM - WASTE ANALYSIS REQUIREMENTS  
(OAC 3745-66-991)

Y/N/NA RMK #

1. In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-991]

- a. Conducted waste analysis and trial treatment storage tests? [3745-66-991(A)]

NA \_\_\_\_\_

OR;

- b. Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of OAC 3745-66-94? [3745-66-991(B)]

\_\_\_\_\_

REMARKS - TANK SYSTEM WASTE ANALYSIS REQUIREMENTS



TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE  
(OAC 3745-66-96)

Y/N/NA RMK #

1. Has the o/o found any tank system(s) to be leaking or unfit for use as a result of the above tests or daily inspections?

Y \_\_\_\_\_

If so, did the owner/operator:

- a. Immediately ceased flow of material into tank and investigate the cause of the release? [3745-66-96(A)]
- b. Remove waste from tank system to prevent further release within 24 hours of detection or earliest practicable time? [3745-66-96(B) (1)]
- c. Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B) (2)]
- d. Immediately conducted a visual inspection of the release? [3745-66-96(C)]
- e. Prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C) (1)]
- f. Properly dispose of any visible contamination of the soil or surface water? [3745-66-96(C) (2)]
- g. Report the release to the Director within 24 hours unless it was less than 1 lb. and was cleaned up immediately? [3745-66-96(D) (1) (2)]
- h. Submitted a written report of the incident to the Director within 30 days of the release? [3745-66-96(C) (3)]
- i. Remediate the spill and repair the unit prior to returning it to service? [3745-66-96-(E)]
- j. For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E) (4)]

N \_\_\_\_\_

N \_\_\_\_\_

NA \_\_\_\_\_

NA \_\_\_\_\_

NA \_\_\_\_\_

NA \_\_\_\_\_

NA \_\_\_\_\_

NA \_\_\_\_\_

NA \_\_\_\_\_

NA \_\_\_\_\_

Note: The requirements noted in 1.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.

2. In the event that the repairs to the tank system were major (replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from a registered, Professional Engineer attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)]

NA \_\_\_\_\_

Was a copy of the certification submitted to the Director within seven days after returning the system to use? [3745-66-96(F)]

NA \_\_\_\_\_

3. If the o/o was unable to repair and return the unit to service as described in 1.a. through 1.e., was the tank system closed in accordance with 3745-66-97? [3745-66-96(E) (1)]

NA \_\_\_\_\_

4. Has the o/o of a tank system with a variance from secondary containment from which a release has occurred but has not migrated beyond the zone of engineering control complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G) (3)]

NA \_\_\_\_\_

If soils cannot be removed, has the tank been closed? [3745-66-93(G) (3)]

NA \_\_\_\_\_

5. Has the o/o of a tank system with a variance from secondary containment from which a release has occurred and has migrated from the zone of engineering control complied with 3745-66-96(A) through (D) and prevented migration and decontaminated soil? [3745-66-93(G) (4)]

NA \_\_\_\_\_

REMARKS - TANK SYSTEMS FOUND LEAKING OR UNFIT FOR USE

## RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

## I. General Information

Facility: LTV Steel - Cleveland East  
 U.S. EPA ID No.: OH 004 218 673  
 Street: 3100 East 45th Street  
 City: Cleveland State: OH Zip: 44127  
 Telephone: (216) 429-6370

Inspection Date: 1/31/91 Time: 9:30 (am/pm)

Weather Conditions: C/c

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>Greg Taylor</u>	<u>OEPA Env. Sci.</u>	<u>(216) 425-9171</u>
	<u>Marlene Emanuelson</u>	<u>OEPA Env. Sci.</u>	<u>(216) 425-9171</u>
Facility Representatives:	<u>Stan Rihtar, Tom Girdler, Ron Knapik</u>		

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>✓</u>	<u>_____</u>
F020-F023 and F026-F028	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
California List*	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
First Third [40 CFR 268.10]	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>✓</u>	<u>_____</u>
Second Third [40 CFR 268.11]	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Third Third [40 CFR 268.12]	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>✓</u>	<u>_____</u>

\* See Appendix A

## INSPECTION SUMMARY

### Processes That Generate LDR Wastes:

Integrated Steel plant producing zinc coated sheets and coils, bar products, hot rolled coil & strip, cold rolled coil and strip.

### LDR Waste Management:

BoF Dust - D008 - Wayne Michigan Disposal

K062 - Pickle Liquor - Eaglebrook of Ohio, Inc. (Cleveland Oh.)

F001 - Tetrachlorethylene - Chemtron (Avon, Oh.)

D001, D018, D039 - Safety-Kleen

### Summary:

Signature:

## RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

## II. WASTE IDENTIFICATION

## A. List waste codes which the facility handles in each of the following LDR categories\*:

1. F001 through F005 spent solvents: F001
2. F020-F023 and F026-F028 dioxin-containing wastes: \_\_\_\_\_
3. California List Wastes (See Appendix A): \_\_\_\_\_
4. First Third Wastes [40 CFR 268.10]: K062
5. Second Third Wastes [40 CFR 268.11]: \_\_\_\_\_
6. Third Third Wastes [40 CFR 268.12]\*\*: D001, D008, D018, D039.

\*See Appendix B.

\*\* Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

## B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?\*

Yes ☒ No ☐

If no, list below:

Assigned ClassificationCorrect Classification

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

\*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: \_\_\_\_\_

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☒ No ☐ NA ☐

Comments \_\_\_\_\_

3. Has multi-source leachate been assigned the F039 waste code?\* [40 CFR 261.31]

Yes ☐ No ☐ NA ☒

\*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ☐ No ☐

Comments \_\_\_\_\_

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ☐ No ☒ List \_\_\_\_\_

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ☐ No ☒ List \_\_\_\_\_

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ☐ No ☒ List \_\_\_\_\_

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35(b)]

Yes ☐ No ☒ List \_\_\_\_\_

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ☐ No ☒ List \_\_\_\_\_

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]  
Yes ☐ No ☒ List \_\_\_\_\_
7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]  
Yes ☐ No ☒ List \_\_\_\_\_
8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]  
Yes ☐ No ☒ List \_\_\_\_\_
9. Inorganic solid debris as defined in 40 CFR 268.2(g)\*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]  
Yes ☐ No ☒ List \_\_\_\_\_
10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]  
Yes ☐ No ☒ List \_\_\_\_\_
11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)\*. [40 CFR 268.35(d)]  
Yes ☐ No ☒ List \_\_\_\_\_

\*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

\*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.





## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## III. GENERATOR REQUIREMENTS

## A. Treatability Group/Treatment Standard Identification\*

\*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group.

<u>Waste Code</u>	<u>Wastewater*</u>	<u>Nonwastewater</u>
<u>F001</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>      </u>	<input type="checkbox"/>	<input type="checkbox"/>
<u>      </u>	<input type="checkbox"/>	<input type="checkbox"/>

\*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments \_\_\_\_\_

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ☐ No ☐ NA ☒

If yes, list each waste code and check the correct treatability group.

<u>Waste Code</u>	<u>Wastewater*</u>	<u>Nonwastewater</u>
<u>      </u>	<input type="checkbox"/>	<input type="checkbox"/>
<u>      </u>	<input type="checkbox"/>	<input type="checkbox"/>
<u>      </u>	<input type="checkbox"/>	<input type="checkbox"/>

Comments \_\_\_\_\_

\*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☐ No ☒ NA ☐

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
D039			
D001 D018			<input checked="" type="checkbox"/>
D003			<input checked="" type="checkbox"/>
K062			<input checked="" type="checkbox"/>

\* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments Treatability group is not indicated on the notification form for K062.

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ☐ No ☒ NA ☐

*Need to include D018 & D039*

- c. Does the generator specify alternative treatment standards for lab packs?\*

Yes ☐ No ☐ NA ☒

\*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes? [40 CFR 268.42(c)(2)]

☐ Organometallics: 40 Part 268, Appendix IV constituents

☐ Organics: 40 CFR Part 268, Appendix V constituents

\*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?\*

Yes ☐ No ☐ NA ☒

\*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs  $\geq 50$  ppm

Yes ☐ No ☐ NA ☒

If yes, check the appropriate treatability group:

☐ 50 to 500 ppm PCBs

☐  $\geq 500$  ppm PCBs

Listed or characteristic wastes containing  $\geq 1,000$  mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ☐ No ☐ NA ☒

If yes, check the appropriate treatability group:

☐ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)  
☐ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain  $\geq 134$  mg/l nickel and/or  $\geq 130$  mg/l thallium

Yes ☐ No ☐ NA ☒

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ☐ No ☐ NA ☒

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes \_\_\_ No ☒

If yes, did the generator select the most stringent treatment standards?  
[40 CFR 268.41(b) and 268.43(b)]

Yes \_\_\_ No \_\_\_

Comments \_\_\_\_\_

## B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?\* [268.7(a)]

Yes ☒ No \_\_\_

\*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes \_\_\_ No \_\_\_

Comments \_\_\_\_\_

2. Which of the following analytical methods does the generator employ?\*

\*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ☒ No \_\_\_

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

→ D001, D018, D039 - Waste Petroleum Naphtha  
F001 - Tetrachlorethylene

- b. TCLP\*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?\*\*\* (BDAT\*\*\* = stabilization/immobilization technology)

Yes ☒ No \_\_\_ NA \_\_\_

\*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, EPA Test Method 1311]

\*\*See Appendix C for exceptions.

\*\*\*BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

D008 - Tested 10-18-90

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?\* (BDAT = destruction/removal technology)

Yes ☒ No ☐ NA ☐

\*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

K062 - Tested 10-18-90

- d. PFLT\*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ☐ No ☒ NA ☐

\*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ☐ No ☒ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ☐ No ☐

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ☐ No ☐ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- ☐ Based on a detailed chemical and physical analysis of a representative sample  
☐ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ☐ No ☐

Comments \_\_\_\_\_

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited\* wastes with different treatment standards?

\*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☐ No ☒ (If No, go to b.)

List the wastes \_\_\_\_\_

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☐ No ☐

Comments \_\_\_\_\_

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards  
☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act  
☐ Non-toxic\* characteristic wastes  
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

\*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

\_\_\_\_\_

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments \_\_\_\_\_

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes \_\_\_ No \_\_\_ NA ☒

### C. Management

#### 1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator\* - 180) days, or disposed on site?

Yes \_\_\_ No ☒

(If yes, the TSD Checklist must also be completed.)

\* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments \_\_\_\_\_

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes \_\_\_ No \_\_\_ NA ☒

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?\* [40 CFR 268.9(d)]

Yes \_\_\_ No \_\_\_ NA ☒

\*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

#### 2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ☒ No \_\_\_ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
D008	Michigan Disposal, Inc.
D001, F001, D034	Solvent-Klean, Brunswick Ohio
F001	Chemtron, Lima Ohio
P002	Gagebrook of Ohio, Inc.

Does the generator provide a notification to the treatment or storage facility?  
[40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☒

b. Is a notification sent with each waste shipment?

Yes ☒ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to d.)



- b. Are a notification and a certification sent with each waste shipment?

Yes \_\_\_ No \_\_\_

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes \_\_\_ No \_\_\_ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes \_\_\_ No \_\_\_

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes \_\_\_ No \_\_\_ NA \_\_\_ (If No or NA, go to 4.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes \_\_\_ No \_\_\_

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes \_\_\_ No ☒ (If No, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes \_\_\_\_\_ No \_\_\_\_\_

**b. Is a notification sent with each waste shipment?**

Yes \_\_\_\_\_ No \_\_\_\_\_

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes                      No                      (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
------------	--------------------

[illegible]

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement?  
[40 CFR 268.7(a)(9)]

Yes                      No

## 5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☒ No ☐

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes \_\_\_\_\_ No \_\_\_\_\_ NA ☒

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision\*?

Yes \_\_\_\_\_ No \_\_\_\_\_ NA ✓

\*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments

**D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes**

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes      No ✓ (If No, do not complete this section.)

**List types of waste treatment units and processes:**

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes \_\_\_\_\_ No \_\_\_\_\_

Comments \_\_\_\_\_

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes \_\_\_\_\_ No \_\_\_\_\_ NA \_\_\_\_\_

**(If yes, the TSD checklist must also be completed.)**

**E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

[illegible]



## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## IV. TSD REQUIREMENTS

## A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories?  
[40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
F020-F023 and F026-F028 Dioxins	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
California List Wastes	Yes <input type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
First, Second, and Third Third Wastes	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>

Comments \_\_\_\_\_

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ☐ No ☐ NA ☒

3. What date was the waste analysis plan last revised? 3/22/89

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ☒ No ☐

If yes, which of the following are sources of analytical data? (More than one may apply.):

- ☐ Generator provides data  
☐ Facility performs analyses in on-site laboratory  
☒ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ☒ No ☐ NA ☐

If analyses are conducted off site, identify lab: NUS Corporation Pittsburgh Pa.

- a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?\* (BDAT\*\* = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ☒ No ☐ NA ☐

\*See Appendix C for exceptions.

\*\*BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

D008 - Tectol 10-18-90, yearly Tested

- b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?\* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

Yes ☒ No ☐ NA ☐

\*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

K062 - 12-7-90, yearly Tested

- c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in liquid hazardous waste? [40 CFR 268.32(i)]

Yes ☐ No ☐ NA ☒

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

## B. Operating Record [40 CFR 264.73 and 265.73]

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ☒ No ☐

2. Does the operating record contain copies of LDR notifications and certifications?\* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ☒ No ☐

\*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ☐ No ☐ NA ☒

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?\*

Yes \_\_\_ No \_\_\_ NA ☒

\*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited\* wastes stored on site in containers?

Yes ☒ No \_\_\_ (If No, go to 2.)

\*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ☒ No \_\_\_

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes \_\_\_ No ☒ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes \_\_\_ No \_\_\_

If yes, state how: \_\_\_\_\_

2. Are prohibited wastes stored on site in tanks?

Yes ☒ No \_\_\_ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ☒ No \_\_\_

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ☒ No \_\_\_ (If Yes, go to 3.)

Can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? [40 CFR 268.50(c)]

Yes \_\_\_ No \_\_\_

If yes, state how: \_\_\_\_\_

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes \_\_\_ No ☒ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes \_\_\_ No \_\_\_

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes \_\_\_ No \_\_\_

#### D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes \_\_\_ No ☒ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes \_\_\_ No \_\_\_ NA \_\_\_ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes \_\_\_ No \_\_\_

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005, D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes \_\_\_ No \_\_\_ NA \_\_\_



4. Describe all other waste codes and treatment processes:

<u>Waste Code</u>	<u>Treatment Processes</u>
_____	_____
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?\*

Yes \_\_\_ No \_\_\_

\*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes \_\_\_ No \_\_\_

Comments \_\_\_\_\_

6. Dilution Prohibition [40 CFR 268.3]:

- a. Does the facility mix prohibited wastes with different treatment standards?

Yes \_\_\_ No \_\_\_ (If No, go to c.)

List the wastes \_\_\_\_\_

- b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes \_\_\_ No \_\_\_

If yes, is this method used for the aggregated wastes?

Yes \_\_\_ No \_\_\_

Comments \_\_\_\_\_

- c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes \_\_\_ No \_\_\_

Comments \_\_\_\_\_

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes \_\_\_ No \_\_\_

Comments \_\_\_\_\_

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes \_\_\_ No \_\_\_ (If No, go to 9.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes \_\_\_ No \_\_\_

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes \_\_\_ No \_\_\_ (If No, go to 10.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes \_\_\_ No \_\_\_

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes \_\_\_ No \_\_\_ (If No, go to E.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes \_\_\_ No \_\_\_

**E. Surface Impoundments [40 CFR 268.4]**

1. Are restricted wastes placed in surface impoundments for treatment?

Yes \_\_\_ No ✓ (If No, go to F.)

List \_\_\_\_\_

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

Yes \_\_\_ No \_\_\_

Comments \_\_\_\_\_

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

Yes \_\_\_ No \_\_\_

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

Yes \_\_\_ No \_\_\_ NA \_\_\_

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

Yes \_\_\_ No \_\_\_

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes \_\_\_ No \_\_\_

Comments \_\_\_\_\_

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ☐ No ☐ Waste Code \_\_\_\_\_  
 Supernatant Yes ☐ No ☐ Waste Code \_\_\_\_\_

Provide the frequency of analyses conducted on treatment residues:

\_\_\_\_\_

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments \_\_\_\_\_

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ☐ No ☐

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ☐ No ☐ NA ☐

Comments \_\_\_\_\_

#### F. Land Disposal

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments\*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ☐ No ☒ (If No, go to G.)

\*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ☐ No ☐

Comments \_\_\_\_\_

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?\* [40 CFR 268.9(c)]

Yes \_\_\_ No \_\_\_ NA \_\_\_

\*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes \_\_\_ No \_\_\_

If yes, at what frequency are analyses performed? \_\_\_\_\_

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes \_\_\_ No \_\_\_ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C) \_\_\_\_\_

Case-By-Case Extension (40 CFR 268.5) \_\_\_\_\_

No-Migration Petition (40 CFR 268.6) \_\_\_\_\_

Treatment Standard Variance (40 CFR 268.44) \_\_\_\_\_

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes \_\_\_ No \_\_\_ NA \_\_\_

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes \_\_\_ No \_\_\_ NA \_\_\_

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes \_\_\_ No \_\_\_ NA \_\_\_

6. Are restricted wastes placed in underground injection wells?

Yes \_\_\_ No \_\_\_ List \_\_\_\_\_

## G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes \_\_\_ No ☒ (If No, go to H.)

2. On-Site Management

- a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes \_\_\_ No \_\_\_ NA \_\_\_

- b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?\* [40 CFR 268.9(d)]

Yes \_\_\_ No \_\_\_ NA \_\_\_

\*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes \_\_\_ No \_\_\_ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code

Receiving Facility

_____	_____
_____	_____
_____	_____

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes \_\_\_ No \_\_\_ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes \_\_\_ No \_\_\_ NA \_\_\_

4. Off-Site Management: Wastes Meets Treatment Standards

- a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes \_\_\_ No \_\_\_ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes \_\_\_ No \_\_\_ (If No, go to b.)

- b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes \_\_\_ No \_\_\_ NA \_\_\_ (If No or NA, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes \_\_\_ No \_\_\_

## 5. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes \_\_\_ No \_\_\_ (If No, go to 6.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

- b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes \_\_\_ No \_\_\_

## 6. Dilution Prohibition [40 CFR 268.3]:

- a. Are prohibited\* wastes with different treatment standards mixed?

\*See Appendix E for distinction between restricted and prohibited wastes.

Yes \_\_\_ No \_\_\_ (If No, go to b.)

List the wastes \_\_\_\_\_

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes \_\_\_ No \_\_\_

Comments \_\_\_\_\_

- b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes \_\_\_ No \_\_\_ (If No, go to c.)

Check appropriate category:

\_\_\_ Dilutes to meet treatment standards  
 \_\_\_ Dilutes to render waste non-hazardous



Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act  
☐ Non-toxic\* characteristic wastes  
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

\*Non-toxic = D001 (except high TDC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

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- c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☐

Comments 

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**H. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

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## LAND DISPOSAL RESTRICTIONS INSPECTION

## V. TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate restricted wastes for more than 10 days? [40 CFR 268.50(a)(3)]

Yes \_\_\_ No \_\_\_

If yes, check the appropriate regulatory status:

\_\_\_ Interim status for storage  
\_\_\_ RCRA permit for storage

(The TSD checklist must also be completed.)

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

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- B. Does the transporter mix or combine restricted wastes of different DOT shipping descriptions? [40 CFR 263.10(c)(2)]?

Yes \_\_\_ No \_\_\_

(If yes, the Generator checklist must also be completed.)

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- C. Are restricted wastes treated in RCRA exempt units (boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes \_\_\_ No \_\_\_ (If No, do not complete this section.)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units or Process</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

Are treatment residuals generated from these units?

Yes \_\_\_ No \_\_\_

Comments \_\_\_\_\_

Are residuals further treated, stored for greater than 10 days, or disposed on site?

Yes \_\_\_ No \_\_\_ NA \_\_\_

(If Yes, the TSD checklist must also be completed.)

## RCRA CHECKLIST FOR INSPECTION OF USED OIL FUEL MARKETERS/PROCESSORS

Name of Facility: LTV Steel Company (see Exhibit 4)  
Address: 3100 East 45th Street  
Cleveland, OH 44127-0000  
EPA I.D. Number: OHD 004218673  
Facility Inspection Representative: Rich Nemeth/Stam Rihtar/Bob Voytko  
Title: Environmental Superintendent/Regional  
Superintendent/Environmental Engineer  
Telephone: (216) 429-6370

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### Applicability

Regulations of 40 CFR Part 266, Subpart E apply to used oil burned for energy recovery in boilers or industrial furnaces. Used oil includes any fuel produced from used oil by processing, blending, or other treatment. (§266.40(a))

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(Specify NA if questions do not apply.)

	Yes	No	Comments:
1. Does the facility accept hazardous waste?	<u>   </u>	<u>  X  </u>	<u>See (1)*</u>
If so, does the facility accept only characteristic hazardous waste? (list codes)(266.40(d))	<u>  NA  </u>	<u>   </u>	<u>See (1)</u>
2. Does the used oil contain > 1000 ppm of total halogens? If so, it is presumed to have been mixed with listed halogenated hazardous waste. (266.40(c))	<u>  X  </u>	<u>   </u>	<u>See (2) &amp; (3)</u> <u>Exhibit 2,</u> <u>Examples 1, 2</u>
3. Does the facility only accept used oil?	<u>   </u>	<u>  X  </u>	<u>See (2)</u>
List generators or other sources:			
<u>Research Oil</u>			
4. Are other materials recycled for energy recovery?	<u>   </u>	<u>  X  </u>	<u>          </u>

\*Comments are listed numerically on pages 8 and 9.

5. Check the following applicable operating practices (for used oil fuel):

<u>Storage</u>	<u>Treatment</u>	<u>Disposal</u>
<input type="checkbox"/> Drum	<input type="checkbox"/> Settling	<input type="checkbox"/> Landfill
<input checked="" type="checkbox"/> Aboveground tank(s)	<input type="checkbox"/> Heat addition	<input type="checkbox"/> Land Treatment
<input type="checkbox"/> Underground tank(s)	<input type="checkbox"/> In-Line Filtering	<input type="checkbox"/> Surface Impoundment
<input type="checkbox"/> Other	<input type="checkbox"/> Centrifugation	
<input type="checkbox"/> Tank sizes	<input type="checkbox"/> Screen Filtration (basket)	<input type="checkbox"/> Other
<u>Exhibits 4 and 5</u>	<input type="checkbox"/> Dehydration	
	<input type="checkbox"/> Emulsion Breaking	
	<input type="checkbox"/> Blending	

Descriptions and Observations: Facility has 5 aboveground tanks: T-351 (250,000 gal.); T-851 (125,000 gal.); T-855 (11,000,000 gal.); T-890 (560 gal.); and T-971 (250,000 gal.)

	Yes	No	Comments:
6. Has the facility notified the U.S. EPA of its waste as fuel activities by January 29, 1986? (§266.43(b))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Exhibit (1)</u>
Specify Notification Information: <u>Subsequent Notification of Hazardous Waste Activity submitted on 1/27/86 to notify EPA of LTV's burning activity. See also (2).</u>			
7. Has the facility submitted a Part A application for storage of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Exhibit (1); See (3)</u>
Specify Part A information: <u>Originally submitted on 7/26/82; Part A withdrawn on 5/1/86.</u>			
8. Does the facility generate hazardous waste? If so, refer to generator checklist.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9. Does the facility have manifests for all shipments of hazardous waste received and sent? (§265.70)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Exhibit (3)</u>
10. Does the facility market only to burners or other marketers who have notified U.S. EPA? (§266.43(b)(2))	<input type="checkbox"/> NA	<input type="checkbox"/>	<u>See (2)</u>
11. Does the facility have copies of required notices from burners and other marketers, received and sent? (§266.43(b)(5))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Exhibit (3)</u>

	Yes	No	Comments:
12. Do invoices contain the following information? (§266.43(b)(4))			
(i) An invoice number	<u>X</u>	<u>    </u>	<u>Exhibit (3)</u>
(ii) Marketer's EPA ID number and Receiver's EPA ID Number	<u>X</u>	<u>(X)</u>	<u>    </u>
(iii) Names and addresses of shipping and receiving facilities	<u>X</u>	<u>    </u>	<u>    </u>
(iv) Quantity of off-specification fuel being delivered	<u>X</u>	<u>    </u>	<u>    </u>
(v) Date of shipment or delivery	<u>X</u>	<u>    </u>	<u>    </u>
(vi) Statement - "This used oil is subject to EPA regulation under 40 CFR Part 266"	<u>X</u>	<u>    </u>	<u>    </u>
13. Does the facility have copies of invoices received and sent for the past three years? (§266.43(b)(6))	<u>X</u>	<u>    </u>	<u>Exhibit (3)</u>
14. Does the facility first claim the used oil meets the specifications? If so,	<u>X</u>	<u>    </u>	<u>    </u>
14a. Does the facility have records of analyses or other information used to claim the used oil meets the specifications? (§266.43(b)(1))	<u>X</u>	<u>    </u>	<u>Exhibit (2), See (2) &amp; (3)</u>
14b. Does the facility have a record or operating log specifying for each shipment? (§266.43(b)(6)(i))			
A. Name and address of receiving facility;	<u>NA</u>	<u>    </u>	<u>See (2) &amp; (3)</u>
B. Quantity of used oil fuel delivered;	<u>NA</u>	<u>    </u>	<u>    </u>
C. Date of delivery or shipment;	<u>NA</u>	<u>    </u>	<u>    </u>
D. Cross-reference to records of used oil analyses or other information?	<u>NA</u>	<u>    </u>	<u>    </u>

Inspector's Name: Jean Michaels and Ron Baker (PRC EMI)

Title: Contracted RCRA Compliance Inspectors (EPA Contract No. 68-W9-0006, TES 9)

Agency: U.S. EPA

Office Location: Chicago, IL

Date of Inspection: 08/28/89

Comments: Comments are listed on pages 8 and 9.

# RCRA CHECKLIST FOR INSPECTION OF HAZARDOUS WASTE FUEL MARKETERS/PROCESSORS

Name of Facility: LTV Steel Company  
 Address: 3100 East 45th Street  
 Cleveland, OH 44127-0000  
 EPA Waste Fuel I.D. Number: OHD 004218673  
 Facility Inspection Representative: Rich Nemeth/Stam Rihter/Bob Voytko  
 Title: Environmental Superintendent/Regional  
 Superintendent/Environmental Engineer  
 Telephone: (216) 429-6370

(Specify NA if questions do not apply.)

Site Characterization:	Yes	No	Comments:
1. Does the facility accept hazardous waste?	<u>    </u>	<u>  X  </u>	<u>See (1)</u>
2. Does the facility blend hazardous waste with used oil to be marketed as fuel?	<u>    </u>	<u>  X  </u>	<u>See (2)</u>
3. Does the facility accept hazardous waste fuel, i.e., used oil previously blended with hazardous waste?	<u>    </u>	<u>  X  </u>	<u>See (2)</u>
4. Does the facility only accept characteristic hazardous waste?	<u>  NA  </u>	<u>    </u>	<u>            </u>
<p>Used oil burned for energy recovery that is hazardous solely because it exhibits a characteristic of hazardous waste is subject to regulations under Subpart E rather than Subpart D. Refer to the Used Oil Fuel Marketer Checklist. (§266.30(b)(1))</p>			
5. Does the facility only accept non-hazardous used oil? If so, refer to the Used Oil Fuel Marketer Checklist.	<u>  X  </u>	<u>    </u>	<u>See (1) and (2)</u>
6. Does the facility generate hazardous waste? If so, refer to generator checklist.	<u>  X  </u>	<u>    </u>	<u>Exhibit (3)</u>
7. Does the facility accept only used oil?	<u>  X  </u>	<u>    </u>	<u>See (1) and (2)</u>
8. Specify other material recycled as fuel.			

In the past, LTV apparently also accepted hazardous waste fuel for burning in on-site industrial boilers and blast furnaces. In addition, the facility may accept and burn off-specification used oil fuel, contrary to their claim that they do not -- see (2) and Exhibit 2.

9. Check the following general operating practices (for hazardous waste):

<u>Storage</u>	<u>Treatment</u>	<u>Disposal</u>
<input type="checkbox"/> Drum	<input type="checkbox"/> Settling	<input type="checkbox"/> Landfill
<input type="checkbox"/> Aboveground tank(s)	<input type="checkbox"/> Heat addition	<input type="checkbox"/> Land Treatment
<input type="checkbox"/> Underground tank(s)	<input type="checkbox"/> In-Line Filtering	<input type="checkbox"/> Surface Impoundment
<input type="checkbox"/> Other	<input type="checkbox"/> Centrifugation	
<input type="checkbox"/> Tank sizes	<input type="checkbox"/> Screen Filtration (basket)	<input type="checkbox"/> Other
_____	<input type="checkbox"/> Dehydration	
_____	<input type="checkbox"/> Emulsion Breaking	
	<input type="checkbox"/> Blending	

Descriptions and Observations: The facility submitted documentation (5/1/86) to withdraw its Part A permit application.

	Yes	No	Comments:
10. Has the facility notified the U.S. EPA of its waste as fuel activities by January 29, 1986? (§266.34(b))	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>Exhibit (1)</u>
Specify Notification Information: <u>Notification of</u>			
<u>Hazardous waste activity dated 4/1/87 Exhibit --.</u>			
11. Has the facility submitted a Part A application for storage of hazardous waste by May 29, 1986? (§266.34(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>See (3);</u> <u>Exhibit 1</u>
Specify Part A information: <u>Original application</u>			
<u>submitted on 7/26/82; Part A withdrawn on 5/1/86.</u>			
12. Does the facility accept hazardous waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>See (1)</u>
Specify waste and generator type. (Request manifests for review)			
<input type="checkbox"/> Small Quantity Generators			
( <input type="checkbox"/> <100kg/m or <input type="checkbox"/> 100 ≤1000 kg/m)			
<input type="checkbox"/> Large Quantity Generators			
Specify waste types: _____			
_____			
_____			

**Note:** If a facility markets hazardous waste fuel, the facility is subject to storage requirements of Parts 262, 264 or 265 and 270, Subparts A through L. Therefore, the RCRA checklist for inspection of TSD facilities may be useful.

Title: Contracted RCRD Compliance Inspectors (EPA Contract No. 68-W9-0006, TES 9)

Office Location: Chicago, IL

Comments: Comments are listed on pages 8 and 9.



# RCRA CHECKLIST FOR BURNERS OF USED OIL FUEL AND HAZARDOUS WASTE FUEL

Name of Facility: LTV Steel Company  
 Address: 3100 East 45th Street  
 Cleveland, OH 44127-0000  
 EPA I.D. Number: OHD 004218673  
 Facility Inspection Representative: Rich Nemeth/Stam Rihter/Bob Voytko  
 Title: Environmental Superintendent/Regional  
 Superintendent/Environmental Engineer  
 Telephone: (216) 429-6370

The following questions pertain to facilities regulated under Part 266 who are burning waste fuel for energy recovery. These do not necessarily apply to incineration under Subpart O of part 265.

(Specify NA if questions do not apply.)

- |  | Yes      | No       | Comments:   |
|--|----------|----------|---|
| 1. Does the facility burn used oil fuel?<br>Specify: <u>X</u> off-specification<br><u>X</u> specification  | <u>X</u> | —        | <u>See (2) and (3)</u>                                  |
| 2. Does the facility burn hazardous waste fuel?  | —        | <u>X</u> | <u>See (1) and (2)</u>                                  |
| 3. Does the facility's burning unit(s) classify as industrial boilers(s) or industrial furnace(s)?   | <u>X</u> | —        | <u>both</u>   |
| 4. Has the owner/operator notified EPA of their waste as fuel activity? (§266.35(b) or §266.44(b))<br><br>Specify Notification Information: <u>Subsequent Notification of Hazardous Waste activity submitted on 1/27/86 to notify EPA of LTV's burning activity.</u> | <u>X</u> | —        | <u>Exhibit (1)</u>                                      |
| 5. Was the facility existing before May 29, 1986?  | <u>X</u> | —        | —   |
| 6. Does the facility have records of the required notices sent to the fuel suppliers (marketers) for hazardous waste fuel or off-specification used oil? (§266.35(d) or §266.44(c))  | <u>X</u> | <u>X</u> | <u>Exhibit 3</u><br><i>Not available after 10/23/80</i> |
| 7. Does the facility have Interim Status or a permit (§3005) for storage of hazardous waste?   | —        | <u>X</u> | <u>See (3); Exhibit (1)</u>                             |

Note: Storage requirements under Subparts A through D, Parts 262, 264 or 265 and 270 apply to these facilities as of May 29, 1986. Therefore, refer to the RCRA Checklist for inspection of TSD facilities.

- |     |  | Yes       | No       | Comments:                          |
|-----|--|-----------|----------|------------------------------------|
| 8.  | Does the facility burn self-generated used oil fuel in a space heater on-site?                               | —         | <u>X</u> | —                                  |
| 9.  | Is the space heater less than 0.5 million BTU/hr and vented to the ambient air?                              | <u>NA</u> | —        | —                                  |
| 10. | Does the facility have the required invoices for shipments of off-specification fuel received from off-site? | <u>NA</u> | —        | <u>See (1)</u>                     |
| 11. | Do the invoices contain all required information?<br>(Refer to Used Oil Marketer Checklist)                  | <u>X</u>  | <u>X</u> | <u>Exhibit (3)</u>                 |
|     | Marketer name and address; <u>Research oil</u>   |           |          | <i>Research oil, inv. 10/23/90</i> |
| 12. | Is the used oil stored prior to burning?   | <u>X</u>  | —        | <u>Exhibit (4)</u>                 |

Inspector's Name: Jean Michaels and Ron Baker (PRC EMI)

Title: Contracted RCRA Compliance Inspectors (EPA Contract No. 68-W9-0006, TES 9)

Agency: U.S. EPA

Office Location: Chicago, IL

Date of Inspection: 8/28/89

Comments:

- 1) The facility claims to no longer accept or burn off-specification oil and hazardous waste fuel. However, in the past, the facility apparently accepted hazardous waste fuel (see manifest, Exhibit 3) for on-site burning in industrial boilers and blast furnaces. Furthermore, the facility's claim that off-specification fuel is not accepted is questionable as described in Comment No. 2 below.
- 2) As explained by Messers. Nemeth, Rihter, and Voytko, LTV is an integrated steel plant, producing zinc-coated sheets and coil; hot-rolled sheets, coil and strip; cold-rolled sheets, coil and strip; and coke plant byproducts. Bunker C (#6) oil and on-specification used oil are burned in the facility's industrial boilers and blast furnaces as part of steel production.

The two fuels are stored on site in several aboveground tanks (Exhibit 4). Used oil (primarily #5 fuel oil) is delivered and stored separately; applicable manifests, notifications and invoices are maintained on-site (Exhibit 3). LTV also performs periodic analyses of the used fuel oil to assure specification compliance (Exhibit 2). The initial example analysis does not appear to include a determination of total halogens, and the results for heavy metals are not shown. Furthermore, the analysis shows the presence of several listed hazardous wastes, including 1,1,1-trichloroethane, tetrachloroethene, benzene, and pentachlorophenol.

However, OSWER Directive 9951.1 -- Waste Oil Interim Enforcement Guidance -- indicates that individual hazardous wastes must be present at concentrations above

100 ppm before the oil is considered a hazardous waste fuel. The highest concentration shown in the analysis in Exhibit 2 is pentachlorophenol at 650 ppb.

Exhibit 2, Example 2, shows total chloride and heavy metals analysis results performed by Research Oil before delivery of used oil. According to this data, total chlorine and lead levels are above the 1,000 ppm, on-specification limit. Since LTV claimed to burn only on-specification fuel oil, this issue raises questions about LTV's perception of on-specification and off-specification used fuel oils.

- 3) The April 1, 1987 Notification of hazardous waste activity (Exhibit 1) identifies LTV Steel Co. as a burner of off-specification used oil fuel. However, the facility claims that it no longer accepts off-specification used oil fuel and hazardous waste fuel for blending and subsequent burning in on-site industrial boilers and blast furnaces. In a previous communication with the EPA on May 1, 1986, LTV submitted documentation to withdraw the RCRA Part A permit for the Cleveland works.

LTV only recently began to conduct the detailed constituent analysis presented in the first example in Exhibit 2. LTV still measures total halogens and the metals required in Part 266.

**EXHIBIT 1**  
**NOTIFICATION OF HAZARDOUS WASTE ACTIVITY AND PART A APPLICATION**

OHD004218673

LTV Steel Company

January 27, 1986

Certified Mail-Return Receipt Requested

U.S. EPA  
Region V  
Post Office Box A3587  
Chicago, Illinois 60604

Ohio EPA  
Post Office Box 1049  
Columbus, Ohio 43216-1049

Attn: RCRA Activities

Attn: Division of Solid and Hazardous  
Waste Management

Re: LTV Steel Company, Inc.  
Cleveland (East) Works  
EPA I.D. No. OHD 004218673

Gentlemen:

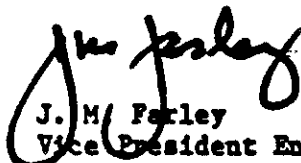
Pursuant to the requirements of 50 FR 49164 (November 29, 1985), LTV Steel Company, Inc. is hereby filing a subsequent notification of its burning activities under section 3010 of RCRA.

At the above referenced facility, LTV Steel Company, Inc. presently burns hazardous waste fuel (Cadence Product 312) in blast furnace(s) which are "industrial furnace(s)" under the definitions in 40 CFR 260.10. In addition, this facility also burns both specification and off-specification used oil fuels in steel plant combustion facilities which are "industrial boilers" and/or "industrial furnaces" as defined in 40 CFR Part 260.10.

LTV Steel Company, Inc. does not intend to store hazardous waste fuel (Cadence Product 312) prior to burning. Thus, this notification is for the burning of hazardous waste fuel and not a notice, prerequisite for interim status, for storage.

Should you have any questions, please contact Mr. L. A. Szuhay at 216-429-6475.

Very truly yours,

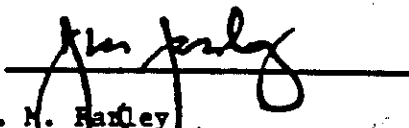
  
J. M. Farley  
Vice President Engineering

JMF/fh

1554a

Certification Statement

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

  
J. M. Hanley  
Vice President Engineering  
LTV STEEL Co., Inc.

Jan 23, 1986

Date



5/22 LAS  
SR  
file

18H / per [unclear]  
East

RECEIVED

MAY 19 1989

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
RCRA ACTIVITIES  
P.O. BOX A3587  
CHICAGO, ILLINOIS 60690

ENVIRONMENTAL CONTROL DEPT.  
CLEVELAND DISTRICT

RCRA ACTIVITIES

5-15-89

RE: EPA ID #: OH0004218673

In response to your request of 4-1-87, the following information has been updated on your notification:

*Waste activity updated to include off-specification used oil. Name changed to LTV Steel. Waste Codes added. Installation contact changed.*

Only your notification form has been revised. According to our records your company notified as a treater/storer/disposer (TSD) facility. Pursuant to 40 CFR Part 270.72 (or equivalent State regulations), you must submit a revised Part A permit application prior to changes in ownership or operational control. If you have ceased your TSD activities, you must go through closure pursuant to 40 CFR Part 264/265 Subpart G (or equivalent State regulations). If you have never operated as a TSD facility, you must withdraw your Part A permit application. If you are located in the authorized States of Illinois, Indiana, Michigan, Minnesota, or Wisconsin, you must comply with the States' equivalent to the above referenced Federal rules. You must also submit the necessary documentation to the State contacts on the attached list.

Please contact the appropriate State agency on the enclosure for further information. If your facility is located in Ohio, contact Mr. George Hamper of the U.S. Environmental Protection Agency's Ohio Technical Section at (312) 353-4789.

Failure to act on this is a serious violation and may subject you to Federal or State enforcement actions under Section 3008 of the Resource Conservation and Recovery Act (or equivalent State authority). If you have any questions concerning this letter contact Ms. Sharon Kiddon at (312) 886-6173.

Sincerely,

Arthur S. Kawatachi, Chief  
Information Section  
RCRA Program Management Branch

Enclosure

cc: State Agency  
Part A File

United States Environmental Protection Agency  
Washington, DC 20460

87-7174

**Notification of Hazardous Waste Activity**

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

### Comments



ID — For Official Use Only									
C									T/A C
W									1

### X. Description of Hazardous Wastes (continued from front)

**Hazardous Wastes from Nonspecific Sources.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1	2 F 0 0 2	3	4	5	6
7	8	9	10	11	12

**Hazardous Wastes from Specific Sources.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13 K 0 6 2	14 K 0 8 7	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. Commercial Chemical Product Hazardous Wastes.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

**D. Listed Infectious Wastes.** Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

**E. Characteristics of Nonlisted Hazardous Wastes.** Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1. Ignitable  
(D001)


☐ 2. Corrosive  
(D002)

☐ 3. Reactive  
(D003)

☒ 4. Toxic  
(D000)

### XI. Certification

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

Signature 	Name and Official Title (type or print) J. F. Bush, General Manager	Date Signed 3/29/87
--	--	------------------------

type in the unshaded areas only  
are spaced for elite type, i.e., 12 characters/inch.

Form Approved OMB No. 158-R0175

U.S. ENVIRONMENTAL PROTECTION AGENCY

# GENERAL INFORMATION

Consolidated Permits Program  
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

FOHDO004218673



GENERAL

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

7/30/87

## GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

## II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		NO
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

## III. NAME OF FACILITY

1 SKIP REPUBLIC STEEL CLEVELAND DISTRICT

## IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)

B. PHONE (area code & no.)

2 AGUIER L SUPT. ENVIR. CONTROL

216 622 6370

## V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 3100 EAST 45TH STREET

B. CITY OR TOWN

4 CLEVELAND

C. STATE D. ZIP CODE

OH 44127

## VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 3100 EAST 45TH STREET

B. COUNTY NAME

CUYAHOGA

C. CITY OR TOWN

6 CLEVELAND

D. STATE E. ZIP CODE

OH 44127

F. COUNTY CODE (if known)

CONTINUED FROM THE FRONT

## VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
7	3	3	1	2	(specify)	7				(specify)									
C. THIRD										D. FOURTH									
7					(specify)	7				(specify)									

## VIII. OPERATOR INFORMATION

A. NAME															B. Is the name listed in Item VIII-A also the owner?				
8 REPUBLIC STEEL CORPORATION															<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)															D. PHONE (area code & no.)				
F = FEDERAL S = STATE P = PRIVATE										M = PUBLIC (other than federal or state) O = OTHER (specify)					P (specify)				
E. STREET OR P.O. BOX										A 216 622 5000									
P O BOX 6778																			
F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND					
B CLEVELAND										OH		44101		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					

## X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
9 N 0H0000957										9 P									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
9 U										81-HW-0186 (specify) Ohio HWFAB Permit									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
9 R										(specify)									

## XI. MAP


Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

## XII. NATURE OF BUSINESS (provide a brief description)

Integrated Steel Plant producing plate; zinc coated sheets and coil; bar products; hot-rolled sheet, coil and strip; cold rolled sheets, coil and strip; coke plant by-products.

## XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)										B. SIGNATURE										C. DATE SIGNED									
P. N. Wigton, Vice President Steel Operations																				7/26/82									
COMMENTS FOR OFFICIAL USE ONLY																													
C																													

## **EXHIBIT 2**

### **LAB ANALYSIS OF USED OIL BURNED AT LTV STEEL**

- Example 1 -- Detailed Constituent Analysis
- Example 2 -- General Analysis



Laboratory Services Group  
5350 Campbells Run Road  
Pittsburgh, PA 15205

REMIT TO:  
Park West Two  
Cliff Mine Road  
Pittsburgh, PA 15275

412-788-1080

1.

LABORATORY ANALYSIS REPORT

CLIENT NAME: LTV STEEL COMPANY  
ADDRESS: 3100 EAST 45TH STREET  
CLEVELAND, OH 44127-0000

NUS CLIENT NO: 0636 0023

ATTENTION: MR. STAN RIHTAR  
CC:

REPORT DATE: 03/13/89

VENDOR NO: 05952415  
WORK ORDER NO: 55830

SAMPLE IDENTIFICATION: RECYCLED FUEL OIL - ZHE EXT.  
NUS SAMPLE NO: P0107192  
DATE SAMPLED : 27-DEC-88  
DATE RECEIVED: 29-DEC-88  
APPROVED BY: Joanne C. Simanic

<u>TEST</u>	<u>DETERMINATION</u>	<u>RESULT</u>	<u>UNIT</u>
\$914	Zero headspace extraction (ZHE)	Done	
OVZHE	VOLATILES - ZHE - PART 261		
	1,1,1,2-Tetrachloroethane	<12	ug/L
	✓ 1,1,1-Trichloroethane	120	ug/L
	1,1,2,2-Tetrachloroethane	<12	ug/L
	✓ 1,1,2-Trichloroethane	<12	ug/L
	1,1-Dichloroethylene	<12	ug/L
	1,2-Dichloroethane	<12	ug/L
	2-Butanone (MEK)	60	ug/L
	Acrylonitrile	<250	ug/L
	Benzene	67	ug/L
	✓ Carbon Tetrachloride	<12	ug/L
	Carbondisulfide	<12	ug/L
	✓ Chlorobenzene	<12	ug/L
	Chloroform	<12	ug/L
	✓ Methylene Chloride	100 B	ug/L
	✓ Tetrachloroethylene (Perchlors)	17	ug/L
	Toluene	430	ug/L
	Trichloroethylene	23	ug/L
	Vinyl Chloride	<25	ug/L
	i-Butanol	*	

COMMENTS: \* Undetected in the sample after searching for ions characteristic for this compound. "B" indicates methylene chloride detected in lab blank at 2ug/L.

CLIENT ORIGINAL



**NUS**  
CORPORATION

Laboratory Services Group  
5350 Campbells Run Road  
Pittsburgh, PA 15205

REMIT TO:  
Park West Two  
Cliff Mine Road  
Pittsburgh, PA 15275  
412-788-1080

LABORATORY ANALYSIS REPORT

CLIENT NAME: LTV STEEL COMPANY  
ADDRESS: 3100 EAST 45TH STREET  
CLEVELAND, OH 44127-0600

NUS CLIENT NO: 0636 0023

REPORT DATE: 03/09/89

VENDOR NO: 05952415  
WORK ORDER NO: 55830

ATTENTION: MR. STAN RUTMAR  
CC:

SAMPLE IDENTIFICATION: RECYCLED FUEL OIL - TOLP LEACH

NUS SAMPLE NO: P0107191  
DATE SAMPLED : 27-DEC-88  
DATE RECEIVED: 29-DEC-88  
APPROVED BY: Joanne C. Simanic

TEST	DETERMINATION	RESULT	UNIT
\$915	TOLP Extraction	Done	
081CLF	BASE NEUTRALS - TOLP/PART 261		
	1,2-Dichlorobenzene	<33	ug/L
	1,4-Dichlorobenzene	<33	ug/L
	2,4-Dimethyltoluene	<33	ug/L
	Bis(2-Chloroethyl)Ether	<33	ug/L
	Hexachlorobenzene	<33	ug/L
	Hexachlorocyclopentadiene	<33	ug/L
	Hexachloroethane	<33	ug/L
	Nitrobenzene	<33	ug/L
	Pyridine	<33	ug/L
070CLF	ACID EXTRACTABLES - TOLP/PART 261		
	2,3,4,6-Tetrachlorophenol	<170	ug/L
	2,4,5-Trichlorophenol	<170	ug/L
	2,4,6-Trichlorophenol	<33	ug/L
	Pentachlorophenol	<170	ug/L
	Phenol	650	ug/L
	m-Cresol	185	ug/L
	o-Cresol	52	ug/L
	p-Cresol	<33	ug/L

COMMENTS:

CLIENT ORIGINAL



Laboratory Services Group  
5350 Campbells Run Road  
Pittsburgh, PA 15205

REMIT TO:  
Park West Two  
Cliff Mine Road  
Pittsburgh, PA 15275  
412-788-1080

LABORATORY ANALYSIS REPORT

CLIENT NAME: LTV STEEL COMPANY  
ADDRESS: 3100 EAST 45TH STREET  
CLEVELAND, OH 44127-0000

REPORT DATE: 03/09/89

ATTENTION: MR. STAN RHAR  
CC:

NUS CLIENT NO: 0636 0023  
VENDOR NO: 05952415  
WORK ORDER NO: 55830

SAMPLE IDENTIFICATION: RECYCLED FUEL OIL - AS REC'D

NUS SAMPLE NO: P0107190  
DATE SAMPLED : 27-DEC-88  
DATE RECEIVED: 29-DEC-88  
APPROVED BY: Joanne C. Simanic

<u>TEST</u>	<u>DETERMINATION</u>	<u>RESULT</u>	<u>UNIT</u>
3090	Flash Point (Pensky Marten)	> 200 F	

COMMENTS:

COMPOSITE OUTGOING FUEL ANALYSES  
FOR OFF-SPEC OIL  
LTV Steel

September 1988

F.P. = 175°F  
Cl<sub>v</sub> = ND  
Cl<sub>t</sub> = 0.2143%

Pb = 108 ppm  
Cd = 0.9 ppm  
Cr = 11 ppm  
As = <1 ppm

December 1988

F.P. = 200°F  
Cl<sub>v</sub> = ND  
Cl<sub>t</sub> = 0.2690%

Pb = 151 ppm  
Cd = 0.8 ppm  
Cr = 10 ppm  
As = <1 ppm

March 1989

F.P. = 206°F  
Cl<sub>v</sub> = ND  
Cl<sub>t</sub> = 0.2408%

Pb = 96 ppm  
Cd = 0.9 ppm  
Cr = 12 ppm  
As = <1 ppm

July 1989

F.P. = 205°F  
Cl<sub>v</sub> = .0075%  
Cl<sub>t</sub> = .4483%

Pb = 84 ppm  
Cd = 1.1 ppm  
Cr = 17 ppm  
As = <1 ppm

F.P. = Flash Point  
Cl<sub>v</sub> = % Volatile Chlorine  
Cl<sub>t</sub> = % Total Chlorine



Research Oil Company

Fuel Oil Oil Recycling Liquid Waste Disposal

2855 Transport Road, Cleveland, Ohio 44115 Telephone: (216) 621-8656



**EXHIBIT 3**  
**INVOICES, MANIFESTS, AND NOTICES**

OHD004218673



# Research Oil Company

2655 Transport Road, Cleveland, Ohio 44115

Telephone: (216) 621-8656

USEPA I.D. No. OHD 004178612

OEPA I.D. No. 81-HW-0046

Fuel Oil • Oil Recycling • Liquid Waste Disposal

## SHIPPING ORDER

**S 20177**

M.C.

Shipped

To LTV EAST

Date 6-23 1986

#1 Power Plant

Customer's Order No. \_\_\_\_\_

Pro No. \_\_\_\_\_

Customer's Release No. \_\_\_\_\_

Inv. No. \_\_\_\_\_

Shipped Via: ☒ Our Truck

☐ Your Truck

☐ \_\_\_\_\_

Hauler J.D.

C - M - I - F - RO - LW

SAT - SUN - HOL

Time In \_\_\_\_\_

Out \_\_\_\_\_

QUANTITY		DESCRIPTION	UNIT PRICE	AMOUNT
PKGS.	GAL.			
	<u>6,300</u>	<u>#5 FUEL OIL</u>		
		<u>combustable liquid</u>		
		<u>NA #17813</u>		
		<u>SPECS</u>		
		<u>API @60° = 27.0</u>		
		<u>S.G. = 7.434 LB/CR</u>		
		<u>BTU/LB = 18,900</u>		
		<u>T.B.S.W. = 0.17</u>		

RECEIVED BY D. Jackson

#1 P-20  
TRUCK PASS & RECORD

4411

CLEVELAND WORKS

ACCOUNTING DEPT

0

TRAFFIC

STATION NO.	SCHEDULED DATE	LOADING TIME REGISTRATIONS
TRUCK FIRM NAME	TIME	IN
TRUCK CAB LICENSE NO.	REQUISITION NUMBER(S)	OUT
TRAILER LICENSE NO.		IN
CONSIGNEE		

INVOICE NUMBER(S)	TRUCK INFO	DETENTION REASON
2227	PICK UP	A. MATERIAL NOT READY
	DELIVERY	B. CRANE BREAK DOWN
	OUT EMPTY	C. LOADING RR CAR
	TIED	D. CRANE SERVICING MILL
	TARPED	E. WENT TRUCK BED
		F. COMBINATION LOAD
		G. TRUCK BREAKDOWN
		H. REWEIGHT

WEIGHT TIME AND DATE  
GROSS 11,840.00  
TARE 2,400.00  
NET 9,440.00  
4/9/60

4

WEIGHED BY

ALL GRAINS MUST INCLUDE THIS NUMBER <b>205626</b> PPR0009 (REV. 7/84)	DRIVER'S SIGNATURE	GUARD'S SIGNATURE
---	--------------------	-------------------



# CLEVELAND WORKS

ACCOUNTING DEPT.

INVOICE

ISS & RECORD

STATION NO.

*42606*

LOCATION

TRUCK FIRM NAME

*Res 01*

CAB NO.

TRUCK CAB LICENSE NO.

*18 U 130*

TRAILER LICENSE NO.

Date

CONSIGNEE

*CTV*

SCHEDULED

DATE

TIME

A.M.

P.M.

REQUISITION NUMBER(S)

*525088*

LOADING TIME REGISTRATIONS

IN

OUT

IN

OUT

IN

OUT

INVOICE NUMBER(S)

*# 5 fuel 01*

✓

TRUCK INFO:

PICK-UP

DELIVERY

OUT. EMPTY

TIED

TARPED

✓

DETENTION REASON

A MATERIAL NOT READY

B CRANE BREAK DOWN

C LOADING RR CAR

D CRANE SERVICING MILL

E WET TRUCK BED

F COMBINATION LOAD

G TRUCK BREAKDOWN

H RE-WEIGH

WEIGHT

LBS. GROSS

LBS. TARE

LBS. NET

DUN

MILL

TIME AND DATE

*2* *58100* LB 07:20 PM 04/23/89

*2* *27160* LB 08:19 PM 04/23/89

*58940*

WEIGHED BY

ALL CLAIMS MUST INCLUDE THIS NUMBER

*147059*

PPR0009 (REV. 7/84)

DRIVER'S SIGNATURE

*Donato*

GUARD'S SIGNATURE

# ADENCE CHEMICAL RESOURCES, INC.

PO BOX 770 MICHIGAN CITY, INDIANA 46360



LOAD RECORD 25098

PHONE: (219) 879-0371

FOR CHEMICAL EMERGENCY - SPILL, LEAK, FIRE, EXPOSURE,  
IDENT - CALL CHEMTREC (800) 424-9300 DAY OR NIGHT.

DATE	HAULER NO.
11-27-55	527

STOMER:

DELIVER TO:

STV STEEL

CLEVELAND EAST, CAMPBELL ROAD  
CLEVELAND, OH 44127  
PO# REL#

DELIVERY ☒ PICK-UP ☐

HAULER	SHIPPED FROM
Petro-Chem	PETRO-CHEM, Detroit MI

HAULER	TRACTOR/TRAILER NO.
	527-4

No. of Units & Container Type	HM	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name and Class per 49 CFR 172.101)	GALLONS	WEIGHT (Subject to Correction)
1 T/T	X	FLAMMABLE LIQUID N.O.S. UN1993 (CHEM-FUEL® BLEND # 5) ® Use of this Product Protected by U.S. Patent No. 4,443,251	6000	

14.013 BTU/LB	1.95 %CI	7.93 lb/gal	Visc. ph = 6.74	Other
---------------	----------	-------------	-----------------	-------

CORRECTED WEIGHT: GROSS	TARE	NET
-------------------------	------	-----

Scheduled Arrival Time:	Actual Arrival Time:	Departure Time:
-------------------------	----------------------	-----------------

Delays due to:

SHIPPED FROM: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the D.O.T.

HAULER: I hereby certify that the above described materials are accepted for transportation and delivery, and the equipment is properly placarded for the classification.

RECEIVED BY: [Signature] Signature  
Date  
CUSTOMER COPY

<b>LV Steel</b>	SPOT CK #	TURN	195558	WEIGH TICKET
SHIPPED FROM - VENDOR OR LOCATION OR DOOR #		MATERIAL		
CADENCE CHEM		FUEL		
TRUCKED BY	TRUCK NO.	TRUCK LICENSE	TRAILER LICENSE	DRIVER
PETRO-CHEM		AK-1296		QUALLS
B/L WEIGHT	WEATHER CONDITIONS	TIME	DATE	WEIGHT
6000 gal	R S W	9 2 8 8 2 2 9 8		0 8 2 9 8 0
DUNN AGE	R S W	1 3 5 8 2 2 9 8		0 3 0 2 6 0
TOTAL WEIGHT	"MIN"	N		527.20
	ACTUAL			

PO-? Rel-?

**DNR**  
**MICHIGAN DEPARTMENT**  
**OF NATURAL RESOURCES**

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐

1979, as amended and Act 136, P.A. 1969.  
 Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Please print or type.

Form Approved. OMB No. 2000-0404 Expires 7-31-86

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>MID980615298</b>		Manifest Document No. <b>000036</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address <b>PETRO-CHEM PROCESSING, INC.</b> <b>421 Lycaste - Detroit, MI 48214</b>						A. State Manifest Document Number <b>MI 0824469</b>					
4. Generator's Phone (313) 824-5840						B. State Generator's ID					
5. Transporter 1 Company Name						C. State Transporter's ID					
6. US EPA ID Number						D. Transporter's Phone					
7. Transporter 2 Company Name						E. State Transporter's ID					
8. US EPA ID Number						F. Transporter's Phone					
9. Designated Facility Name and Site Address <b>LTV STEEL</b> <b>3341 Jennings Rd. 3100 E. 45th St.</b> <b>Cleveland, OH 44101</b>						G. State Facility's ID					
10. US EPA ID Number <b>040004218673</b>						H. Facility's Phone <b>216-398-2800</b>					
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER). <b>Waste flammable liquid, NOS, Flammable Liquid, UN1993</b>						12. Containers No. Type <b>01 TT</b>		13. Total Quantity <b>6200</b>		14. Unit Wt/Vol <b>G</b>	
J. Additional Descriptions for Materials Listed Above <b>Material may contain Waste No. F001.</b> <b>Actual Wt. 49340 lbs.</b>						K. Handling Codes for Wastes Listed Above		a/b/c/d			
15. Special Handling Instructions and Additional Information <b>Designated facility authorized to receive HWF as burner only, pursuant to 40CFR261.6(c)(2).</b> <b>SHIPPER/LOAD RECORD NO. 28592</b>											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.  Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment.											
Printed/Typed Name <b>TIMOTHY TILOTTI</b>						Signature <i>[Signature]</i>		Date Month Day Year <b>05 10 86</b>			
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature <i>[Signature]</i>		Date Month Day Year <b>05 10 86</b>			
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature		Date Month Day Year			
19. Discrepancy Indication Space <b>49,340</b>											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.											
Printed/Typed Name <b>ED. FOWLER</b>						Signature <i>[Signature]</i>		Date Month Day Year <b>05 11 86</b>			

**EXHIBIT 4**  
**SITE PLANS AND TANK LOCATIONS**

OHD004218673

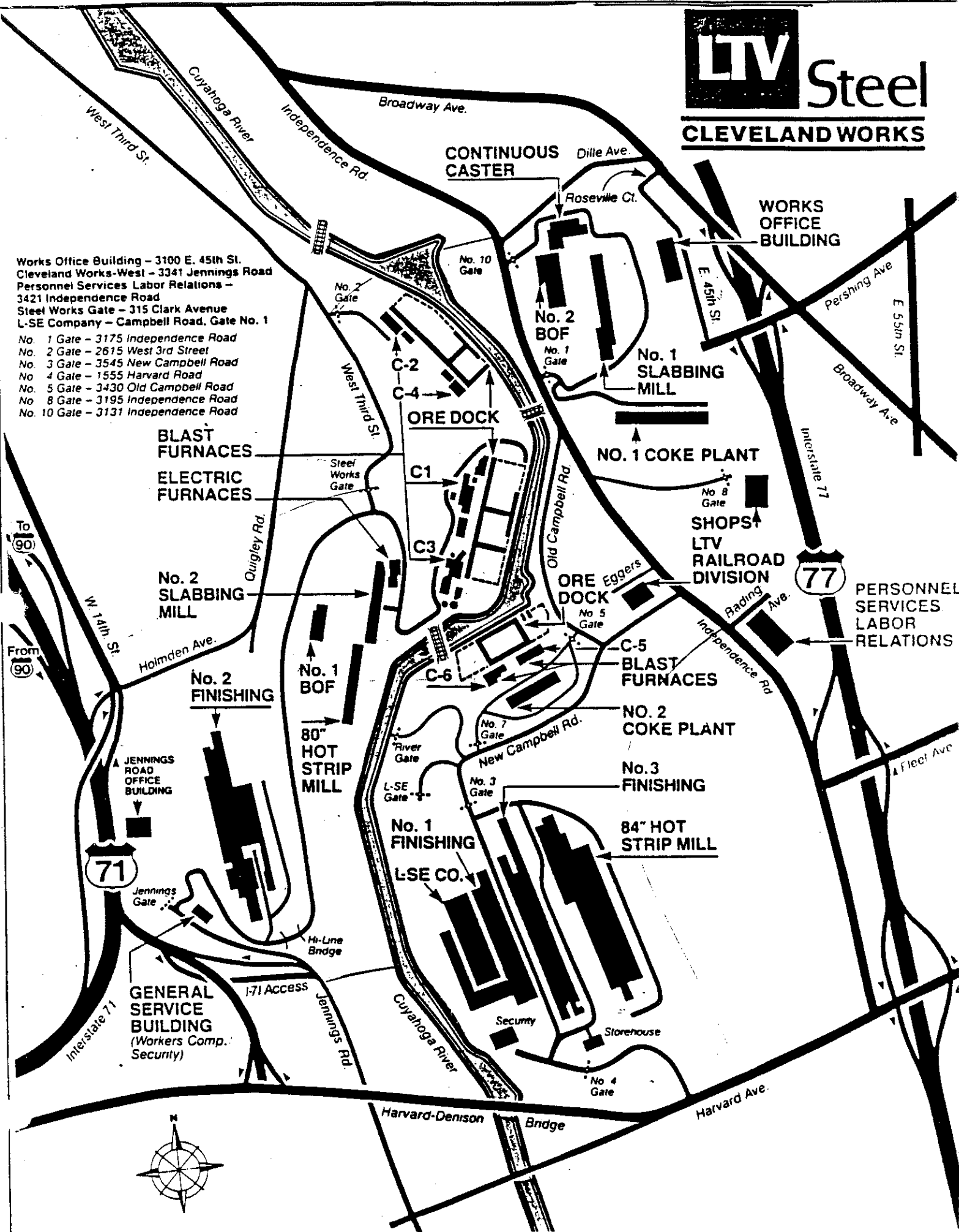


# LTV Steel

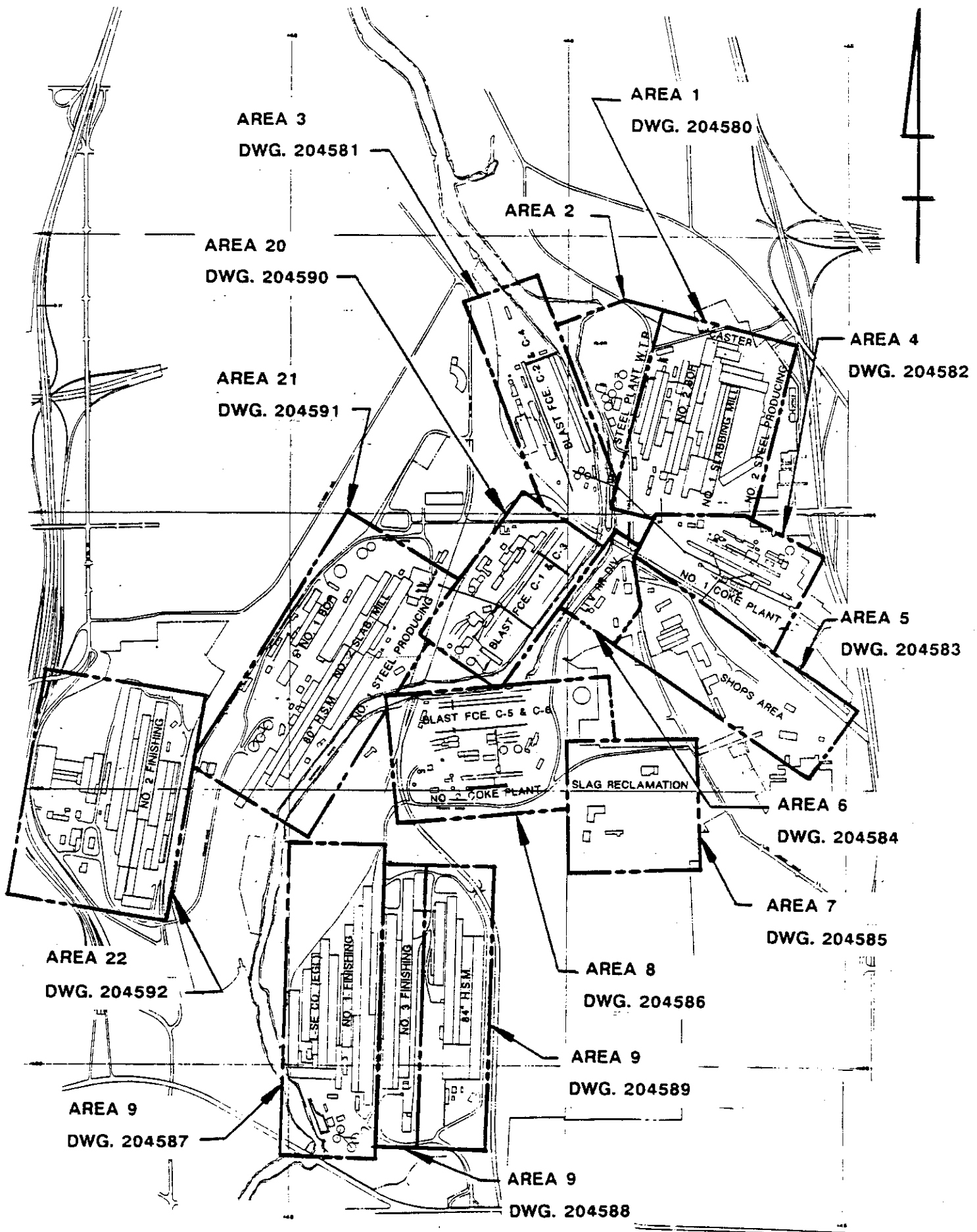
## CLEVELAND WORKS

Works Office Building - 3100 E. 45th St.  
 Cleveland Works-West - 3341 Jennings Road  
 Personnel Services Labor Relations -  
 3421 Independence Road  
 Steel Works Gate - 315 Clark Avenue  
 L-SE Company - Campbell Road, Gate No. 1

No. 1 Gate - 3175 Independence Road  
 No. 2 Gate - 2615 West 3rd Street  
 No. 3 Gate - 3545 New Campbell Road  
 No. 4 Gate - 1555 Harvard Road  
 No. 5 Gate - 3430 Old Campbell Road  
 No. 8 Gate - 3195 Independence Road  
 No. 10 Gate - 3131 Independence Road



## N44



AREA 20

DWG. 204590

AREA 21

DWG. 204591

AREA 2

AREA 22

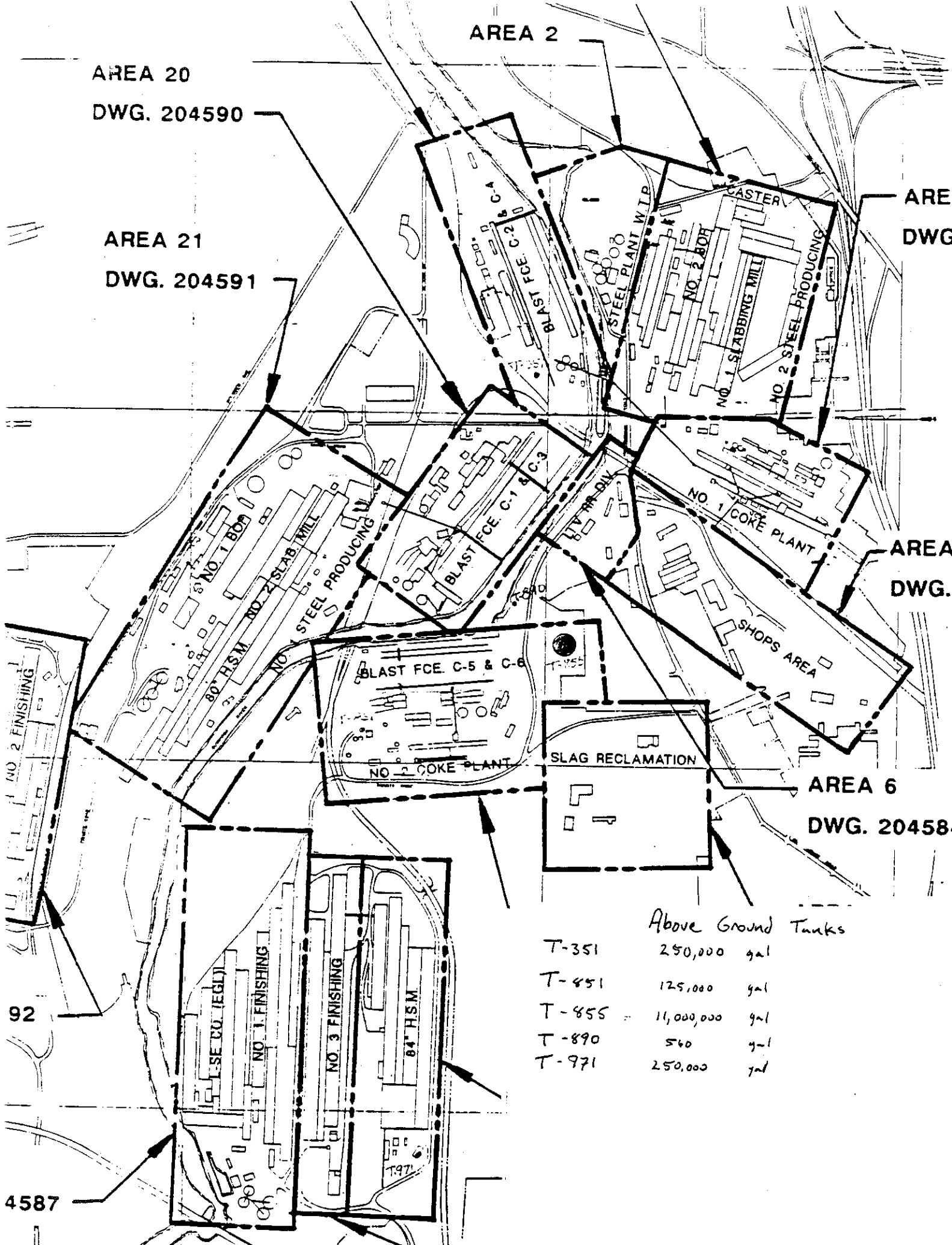
DWG. 204592

AREA 23

DWG. 204593

AREA 6

DWG. 204584



*Above Ground Tanks*

T-351	250,000 gal
T-851	125,000 gal
T-855	11,000,000 gal
T-890	560 gal
T-971	250,000 gal

92

4587

AREA 24

**EXHIBIT 5**  
**ON-SITE PHOTOGRAPHS**

OHD004218673

Photo No. 1



Date: August 28, 1990 Picture Taken By: JMM Facility Name: LTV Steel Co.  
Picture Description: Above-ground tank T-855 (11,000,000 gal.)

Photo No. 2



Date: August 28, 1990 Picture Taken By: JMM Facility Name: LTV Steel Co.  
Picture Description: Another of LTV's above-ground used oil fuel storage tanks.

OHD004218673



28 APR 88 9:30  
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

GENERAL INFORMATION

Facility: LTV CLEVELAND EAST Address: 3100 EAST 45<sup>th</sup> Street City: CLEVELAND  
State: OHIO Zip Code: 44127 County: CUYAHOGA COUNTY Telephone: (216) 429-6370

INHEAD # 02-18-0186

U.S. EPA I.D. # OIID 004-218-673

INSPECTION PARTICIPANT(S)

(Name)	(Title)	(Telephone)
1. <u>RICHARD L. NEMETH</u>	<u>SUPERINTENDENT ENVIRONMENTAL</u>	<u>CONTROL (216) 429-6370</u>
2. <u>TOM HARLAN</u>	<u>ENVIRONMENTAL MANAGEMENT ENGINEER</u>	<u>(216) 429-6535</u>
3. <u>STAN RIHTAR</u>	<u>REGULATION SUPERVISOR</u>	<u>(216) 429-6396</u>
<u>DAVE HABEGER</u>	<u>ENVIRONMENTAL ENGINEER</u>	<u>(216) 398-3168</u>
1. <u>KRIS L. CODER</u>	<u>ENVIRONMENTAL SCIENTIST</u>	<u>(216) 425-9171</u>
2. <u>TEKESA SHDOL</u>	<u>ENVIRONMENTAL ENGINEER</u>	<u>(216) 425-9171</u>
3. <u>GREG TAYLOR</u>	<u>ENVIRONMENTAL SCIENTIST</u>	<u>(216) 425-9171</u>

INSTALLATION ACTIVITY

Mark One

If the site is a TSDI, check the boxes indicating which areas were reviewed.

☒ Generator only (G)

☒ Transporter (T)

☒ TSDI only

☒ G-T

☒ G-TSDI

☒ T-TSDI

☒ G-T-TSDI

☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure

☒ Containers SDI

☒

☒ LTV Steel Company

☒ Richard L. Nemeth  
SUPERINTENDENT  
ENVIRONMENTAL CONTROL  
CLEVELAND WORKS

☐ Waste Piles SDI

☐ Land Treatment DDI

☐ Landfills SDI

LTV Steel Company

Stan Rihtar

REGULATIONS SUPERVISOR  
ENVIRONMENTAL CONTROL DEPARTMENT  
FLAT ROLLED DIVISION-CLEVELAND



3100 EAST 45TH STREET  
CLEVELAND, OHIO 44127  
TELEPHONE (216) 429-6370



3100 EAST 45TH STREET  
CLEVELAND, OHIO 44127  
TELEPHONE (216) 429-6396

REVISION 12/84

# RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. If "yes", is it complete and accurate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Has the facility submitted a Part B?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Was advance notice of the inspection given? If so, how far in advance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

## REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

BOF Dust - Basic Oxygen Furnace dust - is disposed of in a landfill - Michigan Disposal, Wayne Michigan.

K062 - Pickle Liquor - some of the waste is used at the waste water treatment plant, By-Products picks up some of the waste and sells it to POTW plants. Some of the waste is sent to industries that reclaim the iron such as at the LTV Warren facility who then send ~~go~~ back ~~the~~ virgin pickle liquor.

F001 - Degreasing Solvent - Tetrachlorethylene is picked up by Chemtron. also Safety Kleen picks up solvent used in parts cleaning tanks.

K087 - Cool Tar - closed loop recycling -

All wastes stored for less than 90 days.

# RCRA INTERIM STATUS INSPECTION FORM

## 40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PICKLE LIQUOR, COAL TAR DE- CANTER SLUDGE,
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	FOOD SLUDGE, COAL TAR DE- CANTER SLUDGE
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	<u>  </u>	<u>  </u>	<u>✓</u>	<u>  </u>
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
b) The date that accumulation began is clearly marked on each container.	<u>✓</u>	<u>  </u>	<u>  </u>	<u>  </u>
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	<u>  </u>	<u>✓</u>	<u>  </u>	<u>DOCUMENT PERSONNEL TRAINING AND RECORDS FOR EMPLOYEES IN #2 B.O.F. ALSO, FACILITY NEEDS TO DOCUMENT THE TRAINING OF</u>
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	<u>  </u>	<u>✓</u>	<u>  </u>	<u>RECORDS FOR EMPLOYEES IN #2 B.O.F. ALSO, FACILITY NEEDS TO DOCUMENT THE TRAINING OF</u>

RCRA INTERIM STATUS INSPECTION FORM

NOTE:

SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES DE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

# RCRA INTERIM STATUS INSPECTION FORM

## 40. C.R. 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND ISD REQUIREMENTS

### Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	WASTE ANALYSIS PLAN NEEDS REVISION FOR FOR BUF #2 SLUDGE AND SAFETY-ALLEN NATTA SOLVENT.
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, <u>or</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SECURITY SERVICE
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c)) [3745-65-14(C)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]	<u>      </u>	<u>  ✓  </u>	<u>      </u>	<u>FACILITY NEEDS TO DOCUMENT INSPECTIONS + REMEDIATIONS IN #2 BOF.</u>
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(D)(4)]	<u>      </u>	<u>  ✓  </u>	<u>      </u>	<u>SAME AS ABOVE</u>
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	<u>      </u>	<u>  ✓  </u>	<u>      </u>	<u>SEE RECORDS</u>
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	<u>      </u>	<u>  ✓  </u>	<u>      </u>	<u>NOTES FOR #2 BOF</u>
9. If required due to the actual hazards associated with Ignitable, Reactive or Incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
b) Physical separation of incompatible waste materials.	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>  ✓  </u>	<u>      </u>	<u>      </u>	<u>      </u>
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	<u>      </u>	<u>      </u>	<u>  ✓  </u>	<u>      </u>

# RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

## Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] DUMPSTER OF  
K087 - ON SITE  
MENT - CLEANED UP  
DOCUMENTED IN  
APRIL 25, 1988 LETTER.
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]
  - a) Internal alarm system. FIRE ALARMS/  
TELEPHONE/ALARM
  - b) Access to telephone, radio or other device for summoning emergency assistance. LEVEL ALARMS W/ST  
FEED MARKS.
  - c) Portable fire control equipment.
  - d) Water of adequate volume and pressure, via hoses, sprinkler, foamers or sprayers.
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] SAFETY DEPT.  
MAINTAINS THESE  
RECORDS.
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]

# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
  - a) Actions to be taken by personnel in the event of an emergency incident. ☒
  - b) Arrangements or agreements with local or state emergency authorities. ☒
  - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. ☒
  - d) A list of all emergency equipment including location, physical description and outline of capabilities. ☒
  - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] ☒
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] ☒
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] ☒
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] ☒
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j)). [3745-65-56(A-J)] ☒

# RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

## Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

- a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]
- b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
- c) The estimated (or actual) weight, volume or density of the waste material(s).
- d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
- e) The present physical location of each hazardous waste within the facility.
- f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]
- g) Records of any waste analyses and trial tests required to be performed.
- h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).
- i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]
- j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

✓	_____	_____	_____	OUT IN FACILITY
✓	_____	_____	_____	_____
✓	_____	_____	_____	_____
✓	_____	_____	_____	_____
✓	_____	_____	_____	_____
_____	_____	✓	_____	_____
✓	_____	_____	_____	_____
✓	_____	_____	_____	_____
_____	_____	✓	_____	_____
✓	_____	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>FEB. 27, 1988</u>
<b>NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.</b>				
3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) <u>or</u> the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	



RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart II: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]
  - a) A closure trust fund, or
  - b) A surety bond, or
  - c) A closure letter of credit, or
  - d) A combination of financial mechanisms.
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?
3. When was the most recent estimate made?
4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?
5. When was the most recent estimate made?

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

FINANCIAL RESPONSIBILITY REQUIREMENTS WILL BE  
HANDLED SEPARATELY FROM THIS INSPECTION.

# RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

## Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]
  - a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]
  - b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (tanks, Surface Impoundments, Landfill, etc.) will be carried out.
  - c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)
  - d) A description of steps taken to decontaminate facility equipment.
  - e) The year closure is expected to begin and a schedule for the various phases of closure.
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]
3. The Closure Plan has been submitted to the Regional Administrator/Director 100 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]

CLOSURE PLANS FOR FACILITY UNITS ARE IN THE PROCESS OF BEING SUBMITTED. AND A REVIEW OF THESE PLANS WERE NOT DONE AS PART OF THIS INSPECTION.

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
b) In good physical condition (265.171) [3745-66-71]	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	<u>    </u>	<u>✓</u>	<u>    </u>	<u>MUST BE DONE</u> <u>IN THE #2</u> <u>BOF.</u>
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	<u>✓</u>	<u>    </u>	<u>    </u>	<u>    </u>

# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) [3745-66-92(B)] and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d) [3745-66-92(D)].
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide. (265.192(c)) [3745-66-92(C)]
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard. (265.194) [3745-66-94(A)(B)(C)]
4. Weekly inspections are made of all tank construction materials and containment structures. (265.194) [3745-66-94(D)(E)]
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)) [3745-66-93(A)(B)]
  - a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.
  - b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a)) [3745-66-98(A)]				
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17(B)].			✓	
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.			✓	
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)) [3745-66-98(B)]			✓	
8. Incompatible waste materials are placed in the same tanks or put in contaminated tanks only under completely controlled and safe conditions as specified in Section 265.17(b). (265.199) [3745-66-99(A)(B)]			✓	
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of. (265.197) [3745-66-97]]			✓	

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: LTV Steel Cleveland EAST

U.S. EPA I.D. No.: OH D 004-218-673

Street: 3100 EAST 45<sup>TH</sup> ST.

City: Cleveland State: OHIO Zip Code: 44127

Telephone: (216) 429-6370

Operator: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Owner: \_\_\_\_\_

Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Inspection Date: 1 / 1 Time: \_\_\_\_\_ - \_\_\_\_\_ Weather Conditions: \_\_\_\_\_

	Name	Affiliation	Telephone
Inspectors:	<u>Gregory Taylor</u>	<u>OEPA (NEDE)</u>	<u>(216) 425-9171</u>
	<u>Kris Coder</u>	<u>OEPA (NEDE)</u>	<u>(216) 425-9171</u>

Facility Representatives: Richard Nemeth, Tom Harlan, Stan Ribtar  
Dave Habeger

	RCRA Status	F-Solvent	LDR Status California List
Generator	<u>✓</u>	<u>✓</u>	<u>✓</u>
Transporter	_____	_____	_____
Treater	_____	_____	_____
Storer	_____	<u>✓ 290 days</u>	_____
Disposer	_____	_____	_____

## INSPECTION SUMMARY

# RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
<b>A. <u>F-Solvent Wastes</u></b>						
1. F001		<u>✓</u>	<u>  </u>	<u>290 days</u>	<u>  </u>	<u>  </u>
2. F002		<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
3. F003		<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
4. F004		<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
5. F005		<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

## B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

*N.A.*

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
Cadmium	100 mg/L	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
Chromium VI	500 mg/L	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
Lead	500 mg/L	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
Mercury	20 mg/L	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
Nickel	134 mg/L	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
Selenium	100 mg/L	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
Thallium	130 mg/L	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>

*- pickling acid -*



2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

NA

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

✓

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

NA

50 ppm \_\_\_\_\_

500 ppm \_\_\_\_\_

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, state reasons for mixing:

\_\_\_\_\_  
 \_\_\_\_\_

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

NA

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes      ☐ No      ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)  
☐ Pharmaceutical wastewater containing  
☐ spent methylene chloride  
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)? *NA*

☐ Yes      ☐ No      ☐ NA

If yes, specify the method: \_\_\_\_\_

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))? *NA*

☐ Yes      ☐ No      ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

B. Waste Analysis

## 1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes      ☐ No      ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes      ☐ No

If yes, note how this is adequate: EP Toxicity Test  
% Solvent analysis, ~~EP Toxicity Test~~ ~~EP Toxicity Test~~  
Tetra chloroethylene

- TCLP

☐ Yes      ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes      ☐ No      ☐ NA

If yes, specify the waste stream: spent degreasing solvent & sludge

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes      ☒ No      ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes? N.A.

## 2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes      ☐ No      ☒ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

\_\_\_\_ Yes    ☒ No    \_\_\_\_ NA

What type of absorbent is used? \_\_\_\_\_

Check the types of waste to which absorbent is added.

\_\_\_\_ Liquid hazardous waste having a pH less than or equal to 2

\_\_\_\_ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

\_\_\_\_ Liquid hazardous waste containing metals

\_\_\_\_ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☒ Yes    \_\_\_\_ No    \_\_\_\_ NA

If yes, note how this is adequate: \_\_\_\_\_

Analysis

- Testing

☒ Yes    \_\_\_\_ No    \_\_\_\_ NA

If yes, list test method used: \_\_\_\_\_

pH

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

\_\_\_\_ Yes    \_\_\_\_ No    ☒ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: \_\_\_\_\_

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

\_\_\_\_ Yes    ☒ No    \_\_\_\_ NA

**C. Management****1. On-Site Management**

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes      ☐ No

If yes, the TSD Checklist must be completed.

**2. Off-Site Management**

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes      ☐ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes      ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)      ☒ Yes      ☐ No

Applicable treatment standards      ☒ Yes      ☐ No

Manifest number      ☒ Yes      ☐ No

Waste analysis data, if available      ☒ Yes      ☐ No

Identify off-site treatment or storage facilities: Chentron ~~XXXXXX~~

- b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes      ☒ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes      ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: \_\_\_\_\_

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

☐ Yes ☐ No ☐ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes  
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

☒ Yes ☐ No

If yes, list types of waste treatment units and processes:

Distillation Unit

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TRANSPORTER CHECKLIST

NA

## TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, check the appropriate regulatory status:

\_\_\_\_\_ Interim status for storage  
\_\_\_\_\_ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- B. Does the transporter mix, combine, or recontainerize wastes?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- C. Is the waste treated in an exempt treatment process on-site?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

## TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☒ Yes ☐ No ☐ NA  
 o California List ☒ Yes ☐ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

a. What date was the waste analysis plan last revised? June 1987

b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: N.U.S. (F-solvents)  
Water Management (Pickle liquor)

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

d. Describe the frequency of sampling: Annual

- e. Describe procedures used to identify manifest discrepancies:

N.A. do not accept off-site waste

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No



B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No  
*290 day storage*

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

☒ Tanks  
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☒ Yes ☐ No ☐ NA

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

☐ Yes ☒ No ☐ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

☐ Yes ☐ No

If yes, state how: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

☒ Yes    ☐ No    ☐ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

☒ Yes    ☐ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

☒ Yes    ☐ No    ☐ NA

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C. Treatment

*NA*

1. Does the facility treat restricted wastes other than in surface impoundments?

☐ Yes    ☐ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

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3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

☐ Yes    ☐ No

4. Describe frequency of testing treatment residuals:

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5. Is dilution used as a substitute for treatment?

☐ Yes    ☐ No

6. Are notifications prepared by the generators kept in the facility's operating record? ☐ Yes ☐ No
7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility? ☐ Yes ☐ No ☐ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

☐ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets the treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site disposal facilities: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*N.A.*

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment? ☐ Yes ☐ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

☐ Yes ☐ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Provide the frequency of analyses conducted on treatment residues: \_\_\_\_\_

\_\_\_\_\_

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge      \_\_\_\_\_ Yes      \_\_\_\_\_ No

Supernatant      \_\_\_\_\_ Yes      \_\_\_\_\_ No

- a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- c. Are residues subsequently managed in another surface impoundment?

\_\_\_\_\_ Yes \_\_\_\_\_ No

- d. Are residues treated prior to disposal?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, are waste residues treated on-site or off-site?

\_\_\_\_\_ On-site \_\_\_\_\_ Off-site

Identify treatment method: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

E. Land Disposal

*NA*

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: \_\_\_\_\_

\_\_\_\_\_

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

\_\_\_\_\_ Yes \_\_\_\_\_ No

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, at what frequency? \_\_\_\_\_

\_\_\_\_\_

4. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

7. What is the volume of the restricted wastes disposed of to date?

\_\_\_\_\_  
\_\_\_\_\_

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

## APPENDIX A

### SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
carbon tetrachloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input type="checkbox"/> No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
acetone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl acetate	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl benzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methyl isobutyl ketone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input type="checkbox"/> No
cyclohexanone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methanol	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes    ☐ No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid  
nitrobenzene

\_\_\_Yes \_\_\_No  
\_\_\_Yes \_\_\_No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene  
methyl ethyl ketone  
carbon disulfide  
isobutanol  
pyridine

\_\_\_Yes \_\_\_No  
\_\_\_Yes \_\_\_No  
\_\_\_Yes \_\_\_No  
\_\_\_Yes \_\_\_No  
\_\_\_Yes \_\_\_No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

- (a) Are the constituents used as chemical carriers?

\_\_\_Yes \_\_\_No

If yes, list the constituents.

\_\_\_\_\_  
\_\_\_\_\_

- (b) Are the constituents used for degreasing/cleaning?

\_\_\_Yes \_\_\_No

If yes, list the constituents.

\_\_\_\_\_  
\_\_\_\_\_

- (c) Are the constituents used as diluents?

\_\_\_Yes \_\_\_No

If yes, list the constituents.

\_\_\_\_\_  
\_\_\_\_\_

- (d) Are the constituents used as extractants?

\_\_\_Yes \_\_\_No



If yes, list the constituents.

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(e) Are the constituents used for fabric scouring?  
\_\_\_\_ Yes \_\_\_\_ No

If yes, list the constituents.

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(f) Are the constituents used as reaction and synthesis media?  
\_\_\_\_ Yes \_\_\_\_ No

If yes, list the constituents.

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If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.) \_\_\_\_ Yes \_\_\_\_ No
8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
<u>68%</u>	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
<u>51%</u>	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
<u>38%</u>	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

APPENDIX B  
TREATMENT STANDARDS FOR F-SOLVENTS

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L)	
	WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

ies shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
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28 MAY 87 10:00 A.M.  
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 02-18-0186

U.S. EPA I.D. # OHP004218673

GENERAL INFORMATION

Facility: LTU STEEL CO. CLEVELAND EAST Address: 3100 EAST 45<sup>TH</sup> ST. City: CLEVELAND  
State: OHIO Zip Code: 44127 County: CUYAHOGA Telephone: (216) 425-6370

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>RICH NEMETH</u>	<u>SUPERINTENDENT ENV. CONTROL</u>	<u>(216) 425-6370</u>
2.	<u>TOM GIROLER</u>	<u>ENVIRONMENTAL ENGINEER</u>	<u>(216) 425-6370</u>
3.	<u>STAN RIHTAK</u>	<u>REGULATION SUPERVISOR</u>	<u>(216) 425-6370</u>
	<u>TOM HARLAN</u>	<u>SENIOR ENV. MGR. ENGINEER</u>	<u>(216) 425-6535</u>
1.	<u>DAVE HABEGER</u>	<u>INSPECTOR(S) ENVIRONMENTAL ENGINEER</u>	<u>(216) 398-3168</u>
2.	<u>KRIS CODER</u>	<u>ENVIRONMENTAL SCIENTIST</u>	<u>(216) 425-9171</u>
3.			

INSTALLATION ACTIVITY

Mark One

- ☐ Generator only (G)  
☐ Transporter (T)  
☐ TSDF only  
☐ G-T  
☐ G-TSDF  
☐ T-TSDF  
☒ G-T-TSDF

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure  
☒ Containers S01  
☒ Tanks S02/T01  
☐ Surface Impoundments S04/T02  
☐ Incineration/Thermal Treatment

- ☐ Waste Piles S03  
☐ Land Treatment D01  
☐ Landfills D80  
☐ Chemical/Physical/Biological T04  
☐ Groundwater Monitoring  
☐ Post-Closure  
☒ LAND BAN RESTRICTION  
GENERATOR CHECK LIST

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?

Yes No N/A Remark #

✓ — — —

2. If "yes", is it complete and accurate?

✓ — — —

3. Has the facility submitted a Part B?

— ✓ — —

4. Was advance notice of the inspection given? If so, how far in advance?

✓ — — 4 weeks

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

# RCRA INTERIM STATUS INSPECTION FORM

## 40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PICKLE LIQUOR, DEGREASER SLUDGE, (FOOT) COAL TAR DECAINTER SLUDGE,
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0001 NAPHTHA RECYCLE OF COAL TAR SLUDGE TO COKEING OVENS.
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)) [3745-65-01]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	CURRENTLY USING EXPIRED MANIFEST BUT WILL CONVERT OVER.
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

5. The generator meets the following hazardous waste pre-transport requirements:

a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]

Yes No N/A Remark #

✓ — — —

b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].

✓ — — —

c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].

✓ — — —

6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]

— — ✓ —

7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:

✓ — — —

a) The containers are clearly marked with the words "Hazardous Waste".

✓ — — —

b) The date that accumulation began is clearly marked on each container.

8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]

✓ — — —

JJA's, SOP's,  
AND EPCS

9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].

✓ — — —



RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 263 (OAC 3745-53) TRANSPORTER REQUIREMENTS

*REGISTERED WITH U.S.EPA  
BUT NOT WITH PUCO.  
HAVE NOT TRANSPORTED.*

Yes	No	N/A	Remark #
-----	----	-----	----------

1. The entity has registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste. [3745-53-11]
2. The transporter has accepted hazardous wastes for transport only when the waste was accompanied by a manifest prepared by the generator in accordance with Section 262 [3745-53-20(A)]
3. The transporter has signed the manifest as required by Section 263.20(b) [3745-53-20(B)] and has carried the manifest with the waste shipment as required by Section 263.20(c) [3745-53-20(C)].
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20(d) [3745-53-20(D)(1)] and has retained a signed copy (available for inspection) for at least 3 years (263.22(a)) [3745-53-22(A)].
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21) [3745-53-21(A)(B)].
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Section 263.20(e)(f) [3745-53-20(E)(F)].
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) [3745-53-22(D)]).
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?
  - a) Was immediate action taken? (Notify authorities, dike discharge) (263.30(a)) [3745-53-30(A)]

—	—	—	—
—	—	—	—
—	—	—	—
—	—	—	—
—	—	—	—
—	—	—	—
—	—	—	—
—	—	—	—
—	—	—	—

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Were all of the notifications required by Section 263.30(c)(d) [3745-53-20(c)] made?	___	___	___	___
c) Was the discharge cleaned up as required by Section 263.13 [3745-53-31]?	___	___	___	___
9. Does the transporter store hazardous waste temporarily while they are in transit?	___	___	___	___
a) Manifested wastes are stored for 10 days or less ("Transfer Facility") and remain properly DOT-packaged during storage (263.12) [3745-53-12]	___	___	___	___
<p><u>NOTE:</u> TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12 [3745-53-12], TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.</p>				
10. Does the transporter import hazardous waste into the United States?	___	___	___	___
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	___	___	___	___

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTION 263.10(c) [3745-53-10(c)] BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTION 262 [3745-52].

REMARKS, TRANSPORTER REQUIREMENTS

# RCRA INTERIM STATUS INSPECTION FORM

## 40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

Yes No N/A Remark #

### Subpart B: General Facility Standards

1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]

☒ ☐ ☐ ☐

2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]

☐ ☒ ☐ ☐ INCLUDE TEST METHODS ACCORDING TO SW 846.

3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]

☒ ☐ ☐ ☐

b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]

☒ ☐ ☐ ☐

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

4. The facility has -

a) A 24-hour surveillance system, or

☒ ☐ ☐ ☐

b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]

☒ ☐ ☐ ☐

5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]

☒ ☐ ☐ ☐

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]	<u>✓</u>	—	—	—
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	<u>✓</u>	—	—	—
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	<u>✓</u>	—	—	SSA'S + IPC/EPCS + SOP'S
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	<u>✓</u>	—	—	TRAINING RECORDS AT EACH UNIT.
9. If required due to the actual hazards associated with Ignitable, Reactive or Incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	<u>✓</u>	—	—	—
b) Physical separation of incompatible waste materials.	<u>✓</u>	—	—	—
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>✓</u>	—	—	—
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	<u>✓</u>	—	—	—

# RCRA INTERIM STATUS INSPECTION FORM

## Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SPELL AT 84 PICKLE - REMOVED TO U.S. EPA + OHIO EPA. NATIONAL RESPONSE SEPT. 10, 1986
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Internal alarm system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	MOST CASES BOTH
b) Access to telephone, radio or other device for summoning emergency assistance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Portable fire control equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
  - a) Actions to be taken by personnel in the event of an emergency incident. ✓
  - b) Arrangements or agreements with local or state emergency authorities. ✓
  - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. ✓
  - d) A list of all emergency equipment including location, physical description and outline of capabilities. ✓
  - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] ✓
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] ✓
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] ✓
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] ✓
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] ✓

# RCRA INTERIM STATUS INSPECTION FORM

Yes -No N/A Remark #

## Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

OPERATING  
RECORDS KEPT  
AT INDIVIDUAL  
UNITS.

- a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]
- b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
- c) The estimated (or actual) weight, volume or density of the waste material(s).
- d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
- e) The present physical location of each hazardous waste within the facility.
- f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]
- g) Records of any waste analyses and trial tests required to be performed.
- h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).
- i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]
- j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

Yes	No	N/A	Remark #
✓	—	—	—
✓	—	—	—
✓	—	—	—
✓	—	—	—
✓	—	—	—
—	—	✓	—
✓	—	—	—
✓	—	—	—
—	—	✓	—
✓	—	—	—



# RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	✓	—	—	FEB 27-1 <sup>st</sup> SUBMIT TAL APRIL 22 <sup>nd</sup> SECOND SUBMITTAL
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.				
3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]	—	—	✓	—
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]	—	—	✓	—
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]	—	—	✓	—
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) <u>or</u> the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]	—	—	✓	—
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]	—	—	✓	—

# RCRA INTERIM STATUS INSPECTION FORM

Yes    No    N/A    Remark #

## Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- |   |                                     |                          |                                     |                                     |
|---|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| d) A description of steps taken to decontaminate facility equipment.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| e) The year closure is expected to begin and a schedule for the various phases of closure.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]                          | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]                          | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

\* A PARTIAL CLOSURE PLAN HAS BEEN SUBMITTED TO THE DEPA + THE U.S. EPA. A revised closure plan for the 98-inch Pickle Line Storage Tank was submitted to DEPA + the U.S. EPA on Jan. 9, 1987. This plan is currently under review.

# RCRA INTERIM STATUS INSPECTION FORM

Yes    No    N/A    Remark #

## Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]

a) A closure trust fund, or

b) A surety bond, or

c) A closure letter of credit, or

d) A combination of financial mechanisms.

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?

3. When was the most recent estimate made?

4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?

5. When was the most recent estimate made?

—	—	—	—
✓	—	—	AND STANDBY TRUST
—	—	—	—
—	—	—	—
✓	—	—	\$ 132,330
✓	—	—	1986
—	—	✓	—
—	—	✓	—

## REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

(MAY 15, 1987)

FACILITY JUST RECENTLY RECEIVED FTO'S FROM OHIO EPA CONCERNING FINANCIAL REQUIREMENTS FOR LIABILITY COVERAGE.

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	<u>✓</u>	___	___	___
b) In good physical condition (265.171) [3745-66-71]	<u>✓</u>	___	___	___
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	<u>✓</u>	___	___	___
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	<u>✓</u>	___	___	___
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	<u>✓</u>	___	___	___
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	<u>✓</u>	___	___	___
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	<u>✓</u>	___	___	___
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	<u>✓</u>	___	___	___

# RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

## Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) [3745-66-92(B)] and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d) [3745-66-92(D)].
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide. (265.192(c)) [3745-66-92(C)]
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard. (265.194) [3745-66-94(A)(B)(C)]
4. Weekly inspections are made of all tank construction materials and containment structures. (265.194) [3745-66-94(D)(E)]
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)) [3745-66-93(A)(B)]
  - a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.
  - b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a)) [3745-66-98(A)]				
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17(B)].	—	—	✓	—
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	—	—	✓	—
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)) [3745-66-98(B)]	—	—	✓	—
8. Incompatible waste materials are placed in the same tanks or put in contaminated tanks only under completely controlled and safe conditions as specified in Section 265.17(b). (265.199). [3745-66-99(A)(B)]	—	—	✓	—
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of. (265.197) [3745-66-97]]	✓	—	—	—

GENERATOR CHECKLIST

FACILITY IDENTIFICATION

A. Site Name LTV CLEVELAND EAST FACILITY B. Street (or other identifier) 3100 EAST 45<sup>TH</sup> ST.  
 City CLEVELAND D. State OHIO E. Zip Code 44127 F. County Name CUYAHOGA  
 Description of Operations INTEGRATED STEEL PLANT PRODUCING ZINC COATED SHEETS AND COILS; BAR PRODUCTS; HOT ROLLED COIL AND STRIP; COLD ROLLED COIL AND STRIP; CORE PLANT BY-PRODUCTS; AND MERCHANT IRON.  
 EPA ID # DHD 004218673, 02-18-0186  
 Facility Contact (Name and Phone Number) R. L. NEMETH, SUPERINTENDENT ENV. CONTROL, (216) 429-6370

II. F-SOLVENT IDENTIFICATION

A.1. Does the facility generate the following wastes?

a. F001

☒ Yes ☐ No

b. F002

☐ Yes ☒ No

c. F003 ☐ Yes ☒ No

(i) If the F003 wastestream has been mixed with a solid or a hazardous waste by characteristic does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☐ No

(iii) F004

☐ Yes ☒ No

(iv) F005

☐ Yes ☒ No

DEGREASER SLUDGE FROM ELECTRIC SHOP. DEGREASER SLUDGE STORED IN CONTAINER. CONTAINER IS ON PERMIT BUT FACILITY HAS BEEN HANDLING STORAGE UNDER < 90 DAY GENERATOR REQUIREMENTS.

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A.

B. National Extensions

1. Is the waste generated by a Small Quantity Generator?

☐ Yes ☒ No

LAND DISPOSAL RESTRICTIONS

Facility Name: LTU CLEVELAND EAST  
 ID Number: OND 004218673  
 Inspector: K. CODER  
 Date: 28 MAY 87

2. Is the waste generated from a RCRA Corrective Action? ☐ Yes ☒ No Comments
3. Is the waste generated from a CERCLA remedial action ☐ Yes ☒ No
4. Is the solvent waste a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil containing less than one percent total F001-F005 constituents by weight? ☐ Yes ☒ No

BDAT Concentration Identification

- Did the generator determine the appropriate treatability group (§268.41) of the waste (Wastewaters containing solvents, pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)? ☐ Yes ☒ No
- Does the generator contend that F-solvent wastes met applicable treatability group BDAT concentrations upon generation [§268.7(a)(2)]? ☐ Yes ☒ No
- If yes, answer (a) through (c); if no, go to D.

(a) Does the generator certify BDAT compliance based upon "applied knowledge"? ☐ Yes ☐ No

(b) If determined by TCLP, provide date of last test, frequency of testing, and obtain test results.

Date \_\_\_\_\_

Frequency \_\_\_\_\_

(c) Are wastes tested using TCLP when a process or wastestream change occurs? ☐ Yes ☐ No



LAND DISPOSAL RESTRICTIONS

Facility Name: LTC CLEVELAND EAST  
 ID Number: DHD 004318673  
 Inspector: K. CODER  
 Date: 28 MAY 87

D. BDAT Management

Comments

1. Are restricted wastes managed onsite? Yes ☒ No

STORED ON-SITE UNDER  
< 90 DAYS.

If yes, answer 1(a) and (b); if no, answer 2.

(a) For wastes equal to or exceeding BDAT concentrations, is treatment and/or disposal conducted?

Yes No N/A

If yes, TSDP Checklist must be completed.

(b) For wastes less than BDAT concentrations, are test results maintained in the operating record?

Yes No N/A

2. (a) For wastes handled offsite, if waste is determined to be less than BDAT concentrations, does generator provide the disposal facility certifications that waste meets applicable BDAT standards and any applicable waste analysis data [§268.7(a)(2)]?

Yes ☒ No

Identify land disposal facilities receiving the BDAT certified wastes.

(b) For wastes handled offsite, if waste is not less than BDAT concentrations, does generator provide [268.7(a)(1)]:

(i) Notice that BDAT treatment is required?

Yes ☒ No

(ii) EPA waste number?

☒ Yes No

(iii) Applicable treatment standard?

Yes ☒ No

(iv) Manifest number?

☒ Yes No

(c) Identify offsite treatment facilities

CHEMTRON CORPORATION,  
AVON, OHIO

GENERATOR

# LAND DISPOSAL RESTRICTIONS

Facility Name: LTV CLEVELAND EAST  
 ID Number: OH0004218673  
 Inspector: K. CODER  
 Date: 28 MAY 87

## Storage of Restricted Waste

## Comments

Is restricted waste stored for greater than 90 days?

☐ Yes ☒ No

UNDER PERMITTED

(a) If yes, is facility operating under interim status or final permit?

☐ Yes ☐ No

STORAGE BUT BEING

HANDLED UNDER < 90

DAY STORAGE.

yes, TSD Checklist must be completed.

## Treatment Using RCRA 264/265 Exempt Units or Processes

Are treatment residuals generated from RCRA 264/265 exempt units or processes?

☐ Yes ☐ No

(a) If yes, list type of treatment unit and processes \_\_\_\_\_

Residuals from RCRA-exempt treatment units are subject to Land Disposal Restrictions program. Ascertain whether residuals have been subjected to restriction program requirements.

GENERATOR

# LAND DISPOSAL RESTRICTIONS

Facility Name: LTV CLEVELAND EAST  
 ID Number: DHO 004 218673  
 Inspector: K. CODER  
 Date: 28 MAY 87

## APPENDIX 2

### SOLVENT IDENTIFICATION CHECKLIST

Comments

1. Does the facility generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
carbon tetrachloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

2. Does the facility generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
chlorobenzene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,2-trichloroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

3. Does the facility generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
acetone	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ethyl acetate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ethyl benzene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methyl isobutyl ketone	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
cyclohexane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methanol	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

# LAND DISPOSAL RESTRICTIONS

Facility Name: LTV CLEVELAND EAST  
 ID Number: OHD 004 218 673  
 Inspector: K. COOK  
 Date: 28 MAY 87

## Comments

If the F003 wastestream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☒ No

4. Does the facility generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid  
 nitrobenzene

☐ Yes ☒ No  
☐ Yes ☒ No

5. Does the facility generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene  
 methyl ethyl ketone  
 carbon disulfide  
 isobutanol  
 pyridine  
 benzene  
 2-ethoxyethanol  
 2-nitropropane

☐ Yes ☒ No  
☐ Yes ☒ No  
☐ Yes ☒ No  
☐ Yes ☒ No  
☐ Yes ☒ No  
☐ Yes ☒ No  
☐ Yes ☒ No  
☐ Yes ☒ No

6. Are any of the constituents listed in the questions 1-5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

☐ Yes ☒ No

(a) Chemical carriers?

☐ Yes ☒ No

If the answer is yes, list the constituents.

(b) Degreasing/cleaning?

☒ Yes ☐ No

If the answer is yes, list the constituents.

TETRACHLOROETHYLENE

# LAND DISPOSAL RESTRICTIONS

Facility Name: LTV CLEVELAND EAST  
 ID Number: DHD 004 218 673  
 Inspector: K. CODER  
 Date: 28 MAY 87

(c) Diluents? Yes No Comments

If the answer is yes, list the constituents.

(d) Extractants? Yes No

If the answer is yes, list the constituents.

(e) Fabric scouring? Yes No

If the answer is yes, list the constituents.

(f) Reaction and synthesis media? Yes No

If the answer is yes, list the constituents.

If the waste is a mixture of constituents as determined in questions 1-6, answer question 7 to determine whether it is a "solvent mixture" covered by the listings.

7. If the wastestream is mixed and contains more than one of the F001-F005 constituents listed in questions 1-5 (by volume), give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5% methylene chloride.  
 2% trichloroethylene  
 25% 1,1,1-trichloroethane  
 68% mineral spirits  
 100%

If the wastestream is mixed and contains a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the wastestream is mixed and contains only F003 constituents, it is a listed waste. For example:

# LAND DISPOSAL RESTRICTIONS

Facility Name: LTU CLEVELAND EAST  
 ID Number: OH 004218673  
 Inspector: K. WOODER  
 Date: 28 MAY 87

33% acetone  
 16% methanol  
 51% ethyl ether  
100%

## Comments

If the wastestream is mixed and contains F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste.  
 For example:

50% xylene F003  
 12% TCE F001  
 38% mineral spirits  
100%

If questions 1-7 led the inspector to believe the waste may be an F-solvent or an F-solvent mixture, answer question 8.

8. Are any of the above constituents spent solvents? A solvent is considered "spent" when it has been used and is no longer fit for use without being regenerated, reclaimed, or otherwise reprocessed.

☒ Yes ☐ No

If yes to any of the questions in 1-8, the constituents in this process are considered solvent in the common sense of the word as used by chemists and chemical engineers. Refer this facility to the enforcement official for follow-up actions verifying the use of solvents at the facility.

## RCRA INTERIM STATUS INSPECTION FORM

U.S. EPA I.D. NO. OH0004218673

## PART 1. GENERAL INFORMATION

Facility: REPUBLIC STEEL - CLEVELAND Address: 3100 E. 45<sup>TH</sup> STREET City: CLEVELAND  
State: OHIO Zip Code: 44127 County: CUYAHOGA Telephone: 216-622-6370  
Facility Operator: REPUBLIC STEEL (AGUIER) Title: Supt. ENVIR CONTROL Telephone: 216-622-6370  
Facility Owner: REPUBLIC STEEL CORPORATION Address: P.O. BOX 6778  
City: CLEVELAND State: OHIO Zip Code: 44101 Telephone: 216-622-5000  
Type of Ownership: ☒ Private ☐ Government State HWFAB No. 02-18-0186

Date of Inspection: JUNE 11, 1982 Time of Inspection: (Start) 11:00 (Finish) \_\_\_\_\_

Advance Notification? ☐ No ☒ Yes: \_\_\_\_\_

Weather Conditions: \_\_\_\_\_

## INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>DAVID M. GUBANC</u>	<u>Senior Solid Waste Mgt. Engineer</u>	<u>216-622-5916</u>
2.	<u>Edward A. Broestl</u>	<u>Water Management Engineer</u>	<u>216-622-5096</u>
3.	<u>Lawrence Aguiar</u>	<u>Superintendent ENV. Control</u>	<u>216-622-6370</u>
4.	<u>T. M. Girdler</u>	<u>Environmental Engineer</u>	<u>216-622-6384</u>

# RCRA INTERIM STATUS INSPECTION FORM

## INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	DAVID N. WERTZ	ENVIRONMENTAL SCIENTIST	216-425-9171
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☒ Storage C. ☐ Treatment  
D. ☐ Transportation E. ☐ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F001, F003, (F017, <sup>now delisted</sup> K087, K062,

b) Non-Listed Wastes:

D001 I

D002 ☒ C - <sup>now delisted</sup>

D003 R

D000 T

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

☐ Yes, See Remark #         

☒ No



RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

\_\_\_\_\_ Yes, See Remark # \_\_\_\_\_ X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

\_\_\_\_\_ Yes, Complete Part 3 (Transp.) X No

a) Applicable U.S. EPA I.D. Number N/A

b) Ohio P.U.C.O. GR TRSF Number N/A

The facility notified as a transporter, but contracts out all shipments currently and is not registered with P.U.C.O.

7. A brief description of site activity:

Integrated Steel plant producing plate, sheets, coils, & bar products. There is also coke production on the site.

REMARKS, PART 1. (GENERAL INFORMATION)

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Solvents and Coke tar decanter Sludges.</i>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Bulk Tankers</u>
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>#1</u>
8. If the generator elects to store hazardous waste on-site in <u>containers or tanks for 90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:				
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.			<input checked="" type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	—	—	✓	—
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	—	—	✓	—
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	—	—	✓	—
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	—	—	✓	—
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	—	—	✓	—
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	—	—	✓	—
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	—	—	✓	—
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	—	—	—	#2
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	—	—	—	#2

RCRA INTERIM STATUS INSPECTION FORM

11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.

Yes   No   N/A   Remark #

\_\_\_\_\_   \_\_\_\_\_   ✓   \_\_\_\_\_

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

# RCRA INTERIM STATUS INSPECTION FORM

## PART 3. TRANSPORTER REQUIREMENTS

N/A

	Yes	No	N/A	Remark #
1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).	_____	_____	_____	Federal Notification but does not transport wastes
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.	_____	_____	_____	_____
3. The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.	_____	_____	_____	_____
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20 (d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).	_____	_____	_____	_____
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).	_____	_____	_____	_____
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.	_____	_____	_____	_____
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).	_____	_____	_____	_____
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	_____	_____	_____	_____
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A).	_____	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

- |  | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|------------|-----------|------------|-----------------|
| b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?  | _____      | _____     | _____      | _____           |
| c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?   | _____      | _____     | _____      | _____           |
| 9. Does the transporter store hazardous wastes temporarily while they are in transit?  | _____      | _____     | _____      | _____           |
| a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12) | _____      | _____     | _____      | _____           |

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

- |  |       |       |       |       |
|--|-------|-------|-------|-------|
| 10. Does the transporter import hazardous waste into the United States?  | _____ | _____ | _____ | _____ |
| 11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container? | _____ | _____ | _____ | _____ |

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards	E: Manifest/Records/Reporting	H: Financial Requirements
C: Preparedness and Prevention	F: Ground Water Monitoring	
D: Contingency and Emergency	G: Closure	

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	✓	—	—	—
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	✓	—	—	—
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	✓	—	—	—
b) Artificial or natural barrier completely surrounding the active portion of the facility.	✓	—	—	—
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	✓	—	—	—
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	✓	—	—	—



# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>
a) Inspect emergency equipment.	<u>  ✓  </u>	<u>  </u>	<u>  </u>	<u>  </u>
b) Inspect monitoring equipment.	<u>  </u>	<u>  </u>	<u>  ✓  </u>	<u>  </u>
c) Inspect security, alarm and communications devices.	<u>  ✓  </u>	<u>  </u>	<u>  </u>	<u>  </u>
d) Inspect process equipment (pipes, pumps, etc.).	<u>  </u>	<u>  </u>	<u>  ✓  </u>	<u>  </u>
e) Inspect containment structures (dikes, curbs, etc.).	<u>  ✓  </u>	<u>  </u>	<u>  </u>	<u>  </u>
f) Inspect facility for structural malfunctions (roof, floor, etc.).	<u>  </u>	<u>  </u>	<u>  ✓  </u>	<u>  </u>
g) Inspect hazardous waste handling/loading areas each day used.	<u>  ✓  </u>	<u>  </u>	<u>  </u>	<u>  </u>
h) Record of any malfunctions due to equipment or operator errors.	<u>  ✓  </u>	<u>  </u>	<u>  </u>	<u>  </u>
i) Record of any hazardous waste discharges.	<u>  ✓  </u>	<u>  </u>	<u>  </u>	<u>  </u>
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<u>  ✓  </u>	<u>  </u>	<u>  </u>	<u>  # 2  </u>
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	<u>  ✓  </u>	<u>  </u>	<u>  </u>	<u>  # 2  </u>
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

## Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Internal alarm system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Access to telephone, radio or other device for summoning emergency assistance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Portable fire control equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

- |   | <u>Yes</u>                          | <u>No</u>                | <u>N/A</u>                          | <u>Remark #</u> |
|---|-------------------------------------|--------------------------|-------------------------------------|-----------------|
| 5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35),   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                 |
| 6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |                 |
| 7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).   | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> |                 |

## Subpart D: Contingency and Emergency

- |  |                                     |                          |                                     |   |
|--|-------------------------------------|--------------------------|-------------------------------------|---|
| 1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |   |
| a) Actions to be taken by personnel in the event of an emergency incident.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |   |
| b) Arrangements or agreements with local or state emergency authorities.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <u>INSPEC plan</u>                                  |
| c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |   |
| d) A list of all emergency equipment including location, physical description and outline of capabilities.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <u>In The preparedness &amp; prevention section</u> |
| e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).  | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <u>all outside</u>                                  |
| 2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <u>at all gates also</u>                            |

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

## Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	#3
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) The estimated (or actual) weight, volume or density of the waste material(s).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
e) The present physical location of each hazardous waste within the facility.	—	—	✓	—
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	—	—	✓	—
g) Records of any waste analyses and trial tests required to be performed.	✓	—	—	—
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	✓	—	—	—
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	—	—	✓	—
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	✓	—	—	—
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	✓	—	—	—

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	—	—	✓	—
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NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	—	—	✓	—
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# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	—	—	✓	—
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	—	—	✓	—
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	—	—	✓	—
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	—	—	✓	—

## Subpart F: Groundwater Monitoring N/A

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	—	—	—	—

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>

## Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55, -56, -57, -58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
d) A description of steps taken to decontaminate facility equipment.	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	<u>      </u>	<u>      </u>	<u>✓</u>	<u>      </u>
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<u>      </u>	<u>      </u>	<u>✓</u>	<u>      </u>

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	—	—	✓	—
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	—	—	✓	—
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	—	—	✓	—
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	—	—	✓	—
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	—	—	✓	—

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	—	—	✓	—
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	—	—	✓	—
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	—	—	✓	—
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	—	—	✓	—



RCRA INTERIM STATUS INSPECTION FORM

9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.

Yes   No   N/A   Remark #

\_\_\_\_\_   \_\_\_\_\_   ✓   \_\_\_\_\_

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

✓   \_\_\_\_\_   \_\_\_\_\_   \_\_\_\_\_

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

# RCRA INTERIM STATUS INSPECTION FORM

## PART 5. TREATMENT/STORAGE/DISPOSAL

### SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers      N/A

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51, -52-53).	_____	_____	_____	_____
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	_____	_____	_____	_____

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	_____	_____	_____	_____
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	_____	_____	_____	_____

# RCRA INTERIM STATUS INSPECTION FORM

5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).

Yes   No   N/A   Remark #

\_\_\_\_\_

## Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-feet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.

✓ \_\_\_\_\_

2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).

\_\_\_\_\_ ✓ \_\_\_\_\_

3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).

✓ \_\_\_\_\_

4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).

✓ \_\_\_\_\_

5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).

\_\_\_\_\_ ✓ \_\_\_\_\_

- a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.

\_\_\_\_\_ ✓ \_\_\_\_\_

- b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

\_\_\_\_\_ ✓ \_\_\_\_\_

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	—	—	✓	—
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	—	—	✓	—
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	—	—	✓	—
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).	—	—	✓	—
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).	—	—	✓	—
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).	—	—	✓	—

Subpart K: Surface Impoundments

N/A

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).	—	—	—	—
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).	—	—	—	—

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The level of freeboard in the Surface Impoundment is inspected at least once each operating day, the structural containment system is inspected at least once per week and all such inspections are documented (Sections 265.226 and 3745-57-07).	_____	_____	_____	_____
4. Has the facility ever recorded an unplanned release of hazardous waste from the Surface Impoundment(s)? (Sections 265.15 and 3745-55-15).	_____	_____	_____	_____
5. Whenever Surface Impoundments are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the Surface Impoundment, the facility has insured the safety of such changes by one or both of the following methods (265.225 and 3745-57-06).	_____	_____	_____	_____
a) A complete waste analysis plus bench scale or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	_____	_____	_____	_____
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	_____	_____	_____	_____
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in Surface Impoundments the facility has insured the safety of the operation by the following method (Sections 265.229 and 3745-57-10).	_____	_____	_____	_____
a) The waste is treated immediately after placement in the Surface Impoundment so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	_____	_____	_____	_____
7. Incompatible materials are never placed in the same Surface Impoundment unless it is done in compliance with the safety requirements of Section 265.17(b) (Sections 265.230 and 3745-57-11).	_____	_____	_____	_____

# RCRA INTERIM STATUS INSPECTION FORM

- |   | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|------------|-----------|------------|-----------------|
| 8. As required by Subpart F, Sections 265.90 and 3745-55-90 (Groundwater Monitoring) the facility has implemented a groundwater monitoring program capable of determining the impact of the Surface Impoundment(s) on the quality of the groundwater in the uppermost aquifer underlying the facility.                    | _____      | _____     | _____      | _____           |
| 9. In lieu of a groundwater monitoring program, the operator has a written demonstration that there is a low potential for migration of hazardous waste or constituents via ground or surface waters which has been certified in writing by a qualified geologist in compliance with Sections 265.90(c) and 3745-55-90-C. | _____      | _____     | _____      | _____           |
| 10. Upon closure of the Surface Impoundment, the operator intends to remove all wastes, residues, liners and any contaminated soil as required by Sections 265.228 and 3745-57-09 in order to exempt the Surface Impoundment from further regulation under Section 265.   | _____      | _____     | _____      | _____           |

NOTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUNDWATER MONITORING REQUIREMENTS SPECIFIED IN SUBPART G FOR DISPOSAL FACILITIES AND SUBPART N, SECTION 265.310 FOR LANDFILLS. (SECTIONS 265.228 AND 3745-57-09).

## Subpart L: Storage in Waste Piles N/A

- |   | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|------------|-----------|------------|-----------------|
| 1. Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal (Sections 265.251 and 3745-57-31).  | _____      | _____     | _____      | _____           |
| 2. If leachate or runoff from a Waste Pile would be a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation (Sections 265.253 and 3745-57-33). | _____      | _____     | _____      | _____           |
| a) The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste.                                     | _____      | _____     | _____      | _____           |

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff.	_____	_____	_____	_____
c) No liquids or wastes containing free liquids are placed in the pile.	_____	_____	_____	_____
3. No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record (Sections 265.252 and 3745-57-32).	_____	_____	_____	_____
4. Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met (Sections 265.256 and 3745-57-36).	_____	_____	_____	_____
a) The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive and was done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	_____	_____	_____	_____
b) The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.	_____	_____	_____	_____
5. Incompatible materials are never placed in the same Waste Pile or near areas containing residues of a incompatible material unless it is done in compliance with the safety requirements of Section 265.17(b) (Sections 265.257(a)(c) and 3745-57-37-A-C.	_____	_____	_____	_____
6. Piles of hazardous waste are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.257(b) and 3745-57-37-B).	_____	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

Subpart M: Land Treatment N/A

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Is treated hazardous waste capable of biological or chemical degradation?	_____	_____	_____	_____
2. Are run-off and run-on diverted from the facility or collected? (Effective Date: November 19, 1981)?	_____	_____	_____	_____
3. Is waste analyzed according to 265.273?	_____	_____	_____	_____
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	_____	_____	_____	_____
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	_____	_____	_____	_____
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	_____	_____	_____	_____
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?	_____	_____	_____	_____
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	_____	_____	_____	_____
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies).	_____	_____	_____	_____

Subpart N: Landfills

1. General Operating Requirements. Does the facility provide the following:

NOTE: 1a, 1b AND 1c ARE EFFECTIVE ON NOVEMBER 19, 1981.

a) Diversion of run-on away from active portions of the fill? \_\_\_\_\_



RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Collection of run-off from active portions of the fill?	_____	_____	_____	_____
c) Is collected run off treated?	_____	_____	_____	_____
d) Control of wind dispersal of hazardous waste?	_____	_____	_____	_____
2. Surveying and Recordkeeping. Does the operating record include:				
a) A map showing the exact location and dimensions of each cell?	_____	_____	_____	_____
b) The contents of each cell and the location of each hazardous waste type within each cell?	_____	_____	_____	_____
3. Closure and Post-Closure				
a) Is the Closure Plan available for inspection by May 19, 1981?	_____	_____	_____	_____
b) Has this plan been submitted to the Regional Administrator?	_____	_____	_____	_____
c) Has Closure begun?	_____	_____	_____	_____
d) Is Closure cost estimate available by May 19, 1981?	_____	_____	_____	_____
4. Special requirements for ignitable or reactive waste				
a) Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	_____	_____	_____	_____

NOTE: IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE SEE TREATMENT REQUIREMENTS . IF NOT, THE PROVISIONS OF 40 CFR 265.17(b) APPLY.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5) Special Requirements for Incompatible Wastes.				
a) Does the owner or operator dispose of incompatible wastes in separate cells? If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____

# RCRA INTERIM STATUS INSPECTION FORM

- |   | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|------------|-----------|------------|-----------------|
| 6. Special requirements for liquid waste (effective November 19, 1981)  |            |           |            |                 |
| a) Are bulk or non-containerized liquids placed in the landfill?  | _____      | _____     | _____      | _____           |
| b) Does the landfill have a chemically and physically resistant liner system?   | _____      | _____     | _____      | _____           |
| c) Does the landfill have a functional leachate collection system?  | _____      | _____     | _____      | _____           |
| d) Are free liquids stabilized prior to or immediately after placement in the landfill?   | _____      | _____     | _____      | _____           |
| 7. Special requirements for Containers (effective November 19, 1981)  |            |           |            |                 |
| a) Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? | _____      | _____     | _____      | _____           |

## Subparts O and P: Incineration and Thermal Treatment

N/A

### 1. Determination of Steady State

- a) Type of unit (i.e., type of incinerator or thermal treatment): \_\_\_\_\_
- b) Components and steady state condition: \_\_\_\_\_

NOTE: INDICATE WHETHER OR NOT THIS COMPONENT WAS AT STEADY STATE PRIOR TO ADDING WASTE.

<u>Component</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____

# RCRA INTERIM STATUS INSPECTION FORM

## 2. Waste Analysis

NOTE: THE FOLLOWING ARE MINIMUM REQUIREMENTS, FOR WASTES NOT PREVIOUSLY BURNED/TREATED:

- |  | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|------------|-----------|------------|-----------------|
| a) Required analyses; has an analysis been performed for the heating value?  | _____      | _____     | _____      | _____           |
| b) Halogen content?  | _____      | _____     | _____      | _____           |
| c) Sulfur content?   | _____      | _____     | _____      | _____           |
| d) Has documented or written data been substituted for analysis of either:   |            |           |            |                 |
| 1. Lead?   | _____      | _____     | _____      | _____           |
| 2. Mercury?  | _____      | _____     | _____      | _____           |
| e) List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.) |            |           |            |                 |

- |          | <u>Remark #</u> |
|----------|-----------------|
| 1. _____ | _____           |
| 2. _____ | _____           |
| 3. _____ | _____           |
| 4. _____ | _____           |
| 5. _____ | _____           |
| 6. _____ | _____           |
| 7. _____ | _____           |

# RCRA INTERIM STATUS INSPECTION FORM

## 3. Monitoring and Inspections

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Are combustion/emission control instruments monitored at least every 15 minutes?	_____	_____	_____	_____
b) Is steady state maintained or corrections attempted?	_____	_____	_____	_____
c) Is tack plume observed at least hourly for normal color and opacity?	_____	_____	_____	_____
d) Did any stack observations made by owner or operator show a plume different than normal?	_____	_____	_____	_____
e) If yes to "d" above, were corrections made to return emissions to normal appearance?	_____	_____	_____	_____

NOTE: SPECIFY IN REMARKS FOR WHAT PERIOD OF TIME THIS WAS CHECKED.

f) Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	_____	_____	_____	_____
g) Are emergency shutdown controls and system alarms checked daily for proper operation?	_____	_____	_____	_____

## 4. Open Burning

NOTE: ONLY COMPLETE THIS PART IF THE FACILITY OPEN BURNS HAZARDOUS WASTE.

a) Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	_____	_____	_____	_____
b) If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	_____	_____	_____	_____

# RCRA INTERIM STATUS INSPECTION FORM

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft.
101 to 1,000.....	380 m	1,250 ft.
1,001 to 10,000.....	530 m	1,730 ft.
10,001 to 30,000.....	690 m	2,260 ft.

## Subpart Q: Chemical, Physical and Biological Treatment

N/A

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	—	—	—	—
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	—	—	—	—
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	—	—	—	—
4. Are inspection procedures followed according to 265.403?	—	—	—	—
5. Are the special requirements fulfilled for ignitable or reactive wastes?	—	—	—	—
6. Are incompatible waste treated? (If yes, 265.17(b) applies.)	—	—	—	—

NOTE: EPA HAS TEMPORARILY SUSPENDED THE APPLICABILITY OF THE REQUIREMENTS OF THE HAZARDOUS WASTE REGULATIONS IN 40 CFR PARTS 122, 264 AND 265 TO OWNERS AND OPERATORS OF (1) WASTEWATER TREATMENT TANKS THAT RECEIVE, STORE, AND TREAT WASTEWATERS THAT ARE HAZARDOUS WASTE OR THAT GENERATE, STORE OR TREAT A WASTEWATER TREATMENT SLUDGE WHICH IS A HAZARDOUS WASTE WHERE SUCH WASTEWATERS ARE SUBJECT TO REGULATION UNDER SECTIONS 402 OR 307(b) OF THE CLEAN WATER ACT (33 U.S.C. 1251 ET SEQ.) AND (2) NEUTRALIZATION TANKS, TRANSPORT VEHICLES, VESSELS, OR CONTAINERS WHICH NEUTRALIZE WASTES WHICH ARE HAZARDOUS ONLY BECAUSE THEY EXHIBIT THE CORROSIVITY CHARACTERISTIC UNDER 40 CFR 261.22 OR ARE LISTED AS HAZARDOUS WASTES IN SUBPART D OF 40 CFR PART 261 ONLY FOR THIS REASON.



# RCRA Inspection Report

EPA Identification Number OH D004218673

HWFAB Permit Number (if appropriate) 62-18-0186

Facility Name Republic Steel - Cleveland District

Location 3100 East 45<sup>th</sup> Street  
Cleveland, Ohio 44127

Person(s) Interviewed

Lawrence Agvies

T.M. Girdler

David M. Gubanc

Edward A. Braestl

Title

Supt. Environ. Control

Env. Engineer

Senior Solid Waste Eng.

Water Mgt. Engineer

Telephone

216-622-6370

216-622-6384

216-622-5916

216-622-5096

Inspector(s)

David N. Wentz

Agency/Title

Ohio EPA Environmental  
Scientist

Ohio EPA

Ohio EPA

Telephone

216-425-9171

## Installation Activity

Mark One

☐ Generator only (G)

☐ Transporter only (T)

☐ TSDF only

☐ G-T

☐ G-TSDF

☐ T-TSDF

☒ G-T-TSDF

☐ Waste Piles S03

☐ Land Treatment D81

☐ Landfills D80

If the site is a TSDF, check the boxes indicating which forms were used -

☒ General Facility Standards, Prepared and Prevention, Contingency and Emergency, Manifests/Records/Reporti

☐ Groundwater Monitoring

☒ Closure and Post-Closure

☐ Financial Requirements

☐ Containers S01

☒ Tanks S02/T01

☐ Surface Impoundments S04/T02

☐ Incineration/Thermal Treatment T03

☐ Chemical/Physical/Biological T04

ISS Inspection Comments  
Republic Steel - Cleveland District  
June 11, 1982

- #1 - Spent pickle liquor shipped to Canada. Reports required were properly submitted and reviewed at the inspection.
- #2 - Job Safety Analysis (JSA's) are used as personnel training mechanisms, and appear to meet the requirements of the regulations.
- #3 - The waste acid flow is continuous with continuous shipments being taken off the site. The manifests would be a record of the amounts. The storage tanks have a two day capacity.



DEFICIENCY NOTIFICATION TABLE  
ISS INSPECTION

FACILITY NO. - 81-HW-0186  
OWNER - REPUBLIC STEEL CORPORATION - CLEVELAND DISTRICT  
FACILITY NAME - REPUBLIC STEEL CORPORATION  
FACILITY LOCATION - 3100 E. 45th  
FACILITY CONTACT -  
ISS INSPECTION DATE - 4/08/81

PHONE NO. -

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13			
	2	3745-55-13	265.13			
	3	"	"			
	C 1	3745-55-14	265.14			
	2	"	"			
	3	"	"			
	4	"	"			
	D 1	3745-55-15	265.15	B	✓	
	2	"	"	B	✓	
	3	"	"	B	✓	
4	4	"	"	B	✓	
	5	"	"	B	✓	
	6	"	"	B	✓	
	7	"	"	B	✓	
	8	"	"	B	✓	
	E 1	3745-55-16	265.16	A		
	2	"	"	A		
	3	"	"	A		
	4	"	"	A		
	5	"	"	A		
	6	"	"	A		
	F 1	3745-55-17	265.17			
	2	"	"			
	3	"	"			
5	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"		✓	
	3	"	"			
	C 1	3745-55-33	265.33	B	✓	
	2	"	"	B	✓	
	D 1	3745-55-34	265.34			
6	E	3795-55-35	265.35			
	V A 1	3745-55-52	265.52	B	✓	

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	A 2	3745-55-52	265.52		✓	
	3	"	"			
	4	"	"	B	✓	
	5	"	"	B		
7	B 1	3745-55-53	265.53	B		
	C 1	3745-55-55	265.55			
	2	"	"			
	3	"	"			
	D 1	3745-55-56	265.56	B		
VI	A 1	3745-55-71	265.71			
	2	"	"			
	B 1	3745-55-72	265.72			
8	C 1	3745-55-73	265.73	B	✓	
	2b	"	"		✓	
	c	"	"	B		
	d	"	"			
	e	"	"	B		
	f	"	"			
	g	"	"	A		
9	VII A 1	3745-56-03	265.112	A		
	2	"	"			
	3	"	"			
	4	3745-56-32	265.142	A		
	B 1	3745-56-09	265.118			
VIII	I 1	3745-56-51	265.171			
	2	3745-56-52	265.172			
	3	3745-56-53	265.173			
	4	"	"			
	5	3745-56-54	265.174			
	6	3745-56-56	265.176			
10	7	3745-56-57	265.177			
	8	"	"			
	J 1	3745-56-72	265-192			
	2	"	"			
	3	"	"			
	4	3745-56-73	265-193			
	5	3745-56-74	265.194			
	6	3745-56-78	265.198			
	7	3745-56-79	265.199			
11	8	3745-56-78	265.198			
	K 1	3745-57-03	265.222			
	2	3745-57-04	265.223			
	3	3745-57-06	265.225			
	4	3745-57-07	265.226			
	5	"	"			
	6	3745-57-10	265.229			
	7	3745-57-11	265.230			

Je	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12	L	1	3745-57-31	265.251		
		2	3745-57-32	265.252		
		3		265.258		
		4	3745-57-36	265.256		
		5	"	"		
		6	3745-57-37	265.257		
		7	3745-57-37	265.257		
13	M	1	3745-57-52	265.272		
		2	"	"		
		3	3745-57-53	265.273		
		4	3745-57-56	265.276		
		5	3745-57-58	265.278		
		6	3745-57-58	265.278		
		7	3745-57-59	265.279		
		8	3745-57-61	265.281		
		9	3745-57-62	265.282		
14	N	A	1	3745-57-72	265.302	
			2	"	"	
			3	"	"	
			4	"	"	
	B	1	3745-57-79	265.309		
			2	"	"	
	C	1	3745-56-03	265.112		
			2	"	"	
			3	"	"	
			4	3745-56-32	265.192	
	D	1	3745-57-82	265.312		
			3745-55-17	265.17(b)		
15	E	1	3745-57-83	265.313		
			3745-55-17	265.17(b)		
	F	1	3745-57-84	265.314		
			2	"	"	
			3	"	"	
			4	"	"	
	G	1	3745-57-85	265.315		
16	I	B	1	3745-58-33	265.373	
			2	"	"	
			3	"	"	
			4	"	"	
	II	A	5	"	"	
			1a	3745-58-35	265.375	
			b	"	"	
			c	"	"	
			2a	3745-58-35	265.375	
			b	"	"	
17	B	1	"	"		
			2	"	"	
			3	"	"	
			4	"	"	
			5	"	"	

KEY TO CODED ITEMS (COLUMN IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 20 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.



Re: Application Number 81-HW-0186  
Cuyahoga County

September 1, 1981

Lawrence Aguiar  
Republic Steel Corp., Cleveland District  
3100 East 45th Street  
Cleveland, Ohio 44127

Dear Mr. Aguiar:

On April 8, 1981, Melinda Merryfield-Becker of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by yourself.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in cursive script, reading "Paul Flanigan", is written over the typed name.

Paul Flanigan, P.E.  
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V  
Melinda Merryfield-Becker, NEDO

CERTIFIED MAIL



STATE IDENTIFICATION NUMBER  
(If Applicable)

OHD004/218673  
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Republic Steel Corporation - Cleveland District
- (B) Street: 3100 E. 45<sup>th</sup>
- (C) City: Cleveland (D) State: Ohio (E) Zip Code: 44127
- (F) Phone: (216) 622-6370 (G) County: Cuyahoga
- (H) Operator: Same as Above
- (I) Street: \_\_\_\_\_
- (J) City: \_\_\_\_\_ (K) State: \_\_\_\_\_ (L) Zip Code: \_\_\_\_\_
- (M) Phone: \_\_\_\_\_ (N) County: \_\_\_\_\_
- (O) Owner: Republic Steel Corporation
- (P) Street: P.O. Box 6778
- (Q) City: Cleveland (R) State: Ohio (S) Zip Code: 44101
- (T) Phone: (216) 622-5913 (U) County: Cuyahoga
- (V) Date of Inspection: 4/08/81 (W) Time of Inspection (From) 10:45 (To) 2:30
- (X) Weather Conditions: Warm Sunny high 60's F

(Y) Person(s) Interviewed

Lawrence Aguiar

Dale Papajisik

Tom Krupka

Title

Asst. Environmental Control (216) 622-6370

Solid Waste Management Eng. (216) 622-5913

Cost Analysis Environ. Control (216) 622-5913

(Z) Inspection Participants

Melinda Merryfield-Becker

Paula Coffer

Agency/Title

OEPA/Solid Waste Scientist (216) 425-9171

OEPA

Telephone

(216) 462-6741

(AA) Preparer Information

Name

Melinda Merryfield-Becker

Agency/Title

OEPA/Solid Waste Scientist (216) 425-9171

Telephone

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

A. Storage and/or Treatment

1. Containers (I)
2. Tanks (J)
3. Surface Impoundments (K)
4. Waste Piles (L)

B. Land Treatment (M)

C. Landfills (N)

D. Incineration and/or Thermal Treatment (O and P)

E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<u>N/A</u>	—	—	—
2. Facility expansion?	<u>N/A</u>	—	—	—
(b) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>✓</u>	—	—	—
2. Does the owner or operator have detailed waste analysis plan on file at the facility?	<u>✓</u>	—	—	—
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>✓</u>	—	—	<u>1</u>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<u>✓</u>	—	—	—
2. Artificial or natural barrier around facility?	<u>✓</u>	—	—	—
3. Controlled entry?	<u>✓</u>	—	—	—
4. Danger sign(s) at entrance?	<u>✓</u>	—	—	—
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	—	—	—	<u>2</u>
2. Records of operator error?	—	—	—	<u>2</u>
3. Records of discharges?	—	—	—	<u>2</u>

\*Not Inspected



Yes No NI\* Remarks

4. Inspection schedule:

— — — 2

5. Safety, emergency equipment?

— — — 2

6. Security devices?

— — — 2

7. Operating and structural devices?

— — — 2

8. Inspection log?

— — — 2

(E) Do personnel training records include: (Effective 5/19/81)

1. Job Titles?

N/A — — —

2. Job Descriptions?

N/A — — —

3. Description of Training?

N/A — — —

4. Records of Training?

N/A — — —

5. Have facility personnel received required training by 5-19-81?

N/A — — —

6. Do new personnel receive required training within six months?

N/A — — —

(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?

1. Special handling?

N/A — — —

2. No smoking signs?

N/A — — —

3. Separation and protection from ignition sources?

N/A — — —

\*Not Inspected

IV. REPAIREDNESS AND PREVENTION:  
(Part 265 Subpart C)

(A) Maintenance and Operation  
of Facility:

1. Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

— ✓ —

(B) If required, does the Facility  
have the Following Equipment:

1. Internal communications or  
alarm systems?

✓ — —

2. Telephone or 2-way Radios  
at the scene of operations?

✓ — —

3

3. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

✓ — —

Indicate the volume of water and/or foam available for fire control:

Units: Foam system, City Water (unlimited)

(C) Testing and Maintenance of  
Emergency Equipment:

1. Has the Owner or Operator  
established Testing and  
Maintenance Procedures  
for Emergency Equipment?

— — — 2

2. Is Emergency Equipment  
Maintained in Operable  
Conditions?

— — — 2

(D) Has Owner or Operator Provided  
Immediate Access to Internal Alarms?  
(if needed)

✓ — —

(E) Is there adequate aisle space  
for unobstructed movement?

☒ \_\_\_\_\_

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:  
(Part 265 Subpart D)

(A) Does the contingency Plan contain the  
following information:

Yes No NI\* Remarks

1. The actions facility personnel  
must take to comply with  
§265.51 and 265.56 in response  
to fires, explosions, or any  
unplanned release of hazardous  
waste? (If the owner has a Spill  
Prevention, Control, and Counter-  
measures (SPCC) Plan, he needs  
only to amend that plan to  
incorporate hazardous waste  
management provisions that are  
sufficient to comply with the  
requirements of this Part (as  
applicable.)

\_\_\_\_\_ 4

2. Arrangements agreed to by local  
police departments, fire departments,  
hospitals, contractors, and State  
and local emergency response teams  
to coordinate emergency services  
pursuant to §265.37?

\_\_\_\_\_ 5

3. Names, addresses, and phone  
numbers (office and home) of all  
persons qualified to act as  
emergency coordinators?

☒ \_\_\_\_\_

4. A list of all emergency equipment  
at the facility which includes the  
location and physical description  
of each item on the list and a  
brief outline of its capabilities?

\_\_\_\_\_ 4

5. An evacuation plan for facility  
personnel where there is a possibility  
that evacuation could be necessary?  
(This plan must describe signal(s)  
to be used to begin evacuation,  
evacuation routes, and alternate  
evacuation routes?)

\_\_\_\_\_ ☒

Yes No NI\* Remarks

(b) Are copies of the Contingency Plan Available at Site and local Emergency organizations?

✓

(c) Emergency Coordinator

1. Is the facility Emergency Coordinator identified?

✓

2. Is coordinator familiar with all aspects of site operation and emergency procedures?

✓

3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

✓

(D) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

✓

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING  
(Part 265 Subpart E)

Yes No NI\* Remarks

(A) Use of Manifest System

1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?

✓

2. Are records of past shipments retained for 3 years

✓

(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?

NI\*

\*Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

4

2. Does the operating record contain the following information:

\*\*b. The method(s) and date(s) of each wastes treatment, storage, or disposal as required in Appendix I?

✓

6

c. The location and quantity of each hazardous waste within the facility?

7

\*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest numbers if waste was accompanied by a manifest.)

N/A

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

f. Reports detailing all incidents that required implementation of the contingency plan?

N/A

g. All closure and past closure costs as applicable? (Effective 5-19-81)

N/A

\*\* See page 33252 of the May 19, 1980, Federal Register.

\*\*\* Only applies to disposal facilities

\*Not Inspected

	Yes	No	NI*	Remarks
--	-----	----	-----	---------

## (A) Closure and Post Closure

1. Closure Plan Available for Inspection by May 19, 1981?

W/A

2. Has this plan been submitted to the Regional Administrator

W/A

3. Has Closure begun?

W/A

4. Is closure estimate available by May 19, 1981?

W/A

## (B) Post Closure Care and Use of Property

Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?

W/A

### VIII. FACILITY STANDARDS

(Part 265, Subparts I thru R)

#### I USE AND MANAGEMENT OF CONTAINERS

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
--	-----	----	-----	---------

1. Are containers in good condition?

2. Are containers compatible with waste in them?

3. Are containers stored closed?

4. Are containers managed to prevent leaks?

5. Are containers inspected weekly for leaks and defects?

6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?

Indicate if waste is: ☐ Ignitable, ☐ Reactive

\*Not Inspected

Yes No NI\* Rem .s

7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

\_\_\_\_\_

8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?

\_\_\_\_\_

J  
TANKS

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? ☒

9

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

W/A

3. Do continuous feed systems have a waste-feed cutoff?

☒

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

W/A

10

5. Are required daily and weekly inspections done?

☒

2

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

W/A

Indicate if waste is: ☒ Ignitable

☐ Reactive

7. Are incompatible waste stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)

W/A

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Code - 1977" to determine compliance.)

K  
SURFACE IMPOUNDMENTS

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?  
\_\_\_\_\_
2. Do earthen dikes have protective covers?  
\_\_\_\_\_
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?  
\_\_\_\_\_
4. Is the freeboard level inspected at least daily?  
\_\_\_\_\_
5. Are the dikes inspected weekly for evidence of leaks or deterioration?  
\_\_\_\_\_
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)  
\_\_\_\_\_
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)  
\_\_\_\_\_



L  
WASTE PILES

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from the wind?	_____	_____	_____	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	_____	_____	_____	_____
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)	_____	_____	_____	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	_____
<i>Indicate if waste is: <input type="checkbox"/> Ignitable, <input type="checkbox"/> Reactive</i>				
5. Are piles of reactive or ignitable waste protected?	_____	_____	_____	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	_____	_____	_____	_____

## LAND TREATMENT

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

1. Is hazardous waste <sup>treated</sup> capable of biological or chemical degradation? \_\_\_\_\_
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)? \_\_\_\_\_
3. Is waste analyzed according to 265.273? \_\_\_\_\_
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276? \_\_\_\_\_
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? \_\_\_\_\_
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278? \_\_\_\_\_
7. *Are records kept regarding application dates, ~~and~~ rates, quantities, and locations of all hazardous waste placed in the facility?* \_\_\_\_\_
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? *Indicate if waste is: ☐ Ignitable ☐ Reactive* \_\_\_\_\_
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) \_\_\_\_\_

\*Not Inspected

N  
LANDFILLS

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

Yes   No   NI\*   Remarks

(A) General Operating Requirements

Does the facility provide the following:

\*\*1. Diversion of run-on away from active portions of the fill? \_\_\_\_\_

\*\*2. Collection of run-off from active portions of the fill? \_\_\_\_\_

\*\*3. Is collected run off treated? \_\_\_\_\_

4. Control of wind disposal of hazardous waste? \_\_\_\_\_

(\*\*Effective 11-19-81)

(B) Surveying and Recordkeeping

Does the Operating Record include:

1. A map showing the exact location and dimensions of each cell? \_\_\_\_\_

2. The contents of each cell and the location of each hazardous waste type within each cell? \_\_\_\_\_

(C) Closure and Post-Closure

1. Is the Closure Plan available for inspection by 5-19-81? \_\_\_\_\_

2. Has this plan been submitted to the Regional Administrator? \_\_\_\_\_

3. Has Closure begun? \_\_\_\_\_

4. Is Closure cost estimate available by 5-19-81? \_\_\_\_\_

(D) Special requirements <sup>for</sup> ignitable or reactive waste

Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? \_\_\_\_\_

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(E) Special requirements for Incompatible Wastes:				
Does the owner or operator dispose of incompatible wastes in separate cells?	_____	_____	_____	_____
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	_____	_____	_____	_____
2. Does the landfill have a chemically and physically resistant liner system?	_____	_____	_____	_____
3. Does the landfill have a functional leachate collection system?	_____	_____	_____	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	_____	_____	_____	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	_____	_____	_____	_____



(A) Facility Name: Republic Steel  
 (B) Date of Inspection: 4/08/81 - See Remark 11

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): \_\_\_\_\_

B. Components and steady state condition:

\*\*\*\* Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

	Yes	No	NI*	Remarks
1. Required analyses; has an analysis been performed for the following:				
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

2. Documented, written data may be substituted for analysis for these. Are either present for:

a. Lead? ☐ ☐ ☐

b. Mercury? ☐ ☐ ☐

- B. Other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested for.)

Remarks

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_

### III. Monitoring and Inspections

	Yes	No	NI*	Remarks
A. Combustion/emission control instruments monitored at least every 15 minutes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
B. Steady state maintained or corrections attempted?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
C. Stack Plume observed at least hourly for normal color and opacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
D. Did any stack observations made by owner or operator show a plume different than normal?*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
F. Complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
G. Emergency shutdown controls, system alarms checked daily for proper operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

\*Not Inspected

\*\*Specify in Remarks for what period of time this was checked.

Only complete this part if the facility open burning

Yes No NI\* Remarks

1. Does this facility burn only waste explosives?  
(A No answer means other hazardous waste is open-burned.)

2. If this facility open-burns waste explosive, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others		
0 to 100.....	204 m	670	ft
101 to 1,000.....	380 m	1,250	ft
1,001 to 10,000.....	530 m	1,730	ft
10,001 to 30,000.....	690 m	2,260	ft

### Q CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

yes No NI\* Remarks

1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?

2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)

	Yes	No	NI*	Re. rks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutraliz wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

#### IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

#### 1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the Manifest available for review?	<u>✓</u>	_____	_____	_____
(B) Do the Manifest forms reviewed contain the following information: (If possible, make copies of/or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<u>✓</u>	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<u>✓</u>	_____	_____	_____



3. Name and EPA ID Number of  
Transporter(s)?

✓

4. Name, address, and EPA ID  
Number of Designated permitted  
facility and alternate facility?

✓

5. The description of the waste(s)  
(DOT shipping name, DOT hazard class,  
DOT identification number)?

✓

6. The total quantity of waste(s) and  
the type and number of containers  
loaded?

✓

7. Required Certification?

✓

8. Required Signatures?

✓

(C) Does the Owner or Operator Submit  
Exception Reports when Needed?

✓

## 2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance  
with DOT Regulations?  
(Required prior to movement of  
hazardous waste off site)

✓

(B) Are waste packages marked and labeled  
in accordance with DOT Regulations  
concerning hazardous waste materials?  
(Required to movement of hazardous  
waste off site)

✓

(C) If required, are placards available  
to transfer?

✓

### 3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?				12
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days				12
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?				13
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	✓			
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	N/A			
c. Do continuous feed systems have a waste-feed cutoff?	✓			
d. Are required daily and weekly inspections done?	✓			
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	N/A			
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	N/A			

VI. RECORDKEEPING and REPORTING  
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	___	___	___	_____
(B) Has the Generator submitted Annual Reports and Exception Reports as required?	___	___	___	_____

VII. INTERNATIONAL SHIPMENTS  
(Part 262, Subpart E)

(A) Has the installation imported or exported Hazardous Waste?	___	___	___	_____
--	-----	-----	-----	-------

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:
  - a. Notified the Administrator in writing? \_\_\_\_\_
  - b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? \_\_\_\_\_
  - c. Met the Manifest requirements? \_\_\_\_\_
2. Importing Hazardous Waste, has the generator:
  - a. Met the manifest requirements? \_\_\_\_\_

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING  
(Subpart B)

	Yes	No	NI*	Remarks
(A) Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	_____	_____	_____	_____

II. INTERNATIONAL SHIPMENTS

A. Does the Transporter record on the manifest the date the waste left the U.S.?	_____	_____	_____	_____
B. Are signed completed manifest(s) on file?	_____	_____	_____	_____

V. MISCELLANEOUS

A. Does Transporter transport hazardous waste into the U.S. from abroad	_____	_____	_____	_____
B. Does the Transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	_____	_____	_____	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

\*Not Inspected

## REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Republic Steel has been performing many of the ISS requirements for monitoring and safety procedures under previously instituted management plans. Although there is no single operating record, most of the required information is available. The inspections should be logged. The SPCC plan should be updated although the Job Safety Analyses do much to supplement the SPCC plan.

Decanter tar sludge is recycled back into the coke batteries. It is unclear as to whether the coke battery is subject to thermal treatment requirements or not. The sludge is never stored for more than 90 days and it is felt that storage would comply with ISS storage requirements.

It was not realized at the time of the inspection that listed solvents are being reclaimed at the facility. The solvents are not stored for more than 90 days. This storage area was not inspected.

#### REMARK

1. Pickle liquor is the only waste going off site. It is checked quarterly or whenever the process or the raw materials are changed.
2. The facility follows the Keith Stevens Maintenance Program which was developed for them by a private contractor. The storage tanks are checked daily but there is no log kept. The first aid station is checked monthly. However, the SBA unit did not have its inspection tag marked.
3. Walkie talkies.
4. SPCC Plan will be amended to include hazardous wastes. The entity also has developed Job Safety Analyses for every job. These Analyses define the potential hazards and list the required safety equipment. Each department is required to maintain its inventory of safety equipment. Also, a computer printout is kept on every employee which documents any notification of safety procedures.
5. The facility has its own fire fighting crews. They also have contacted the fire departments from Newburgh Heights, Cuyahoga Heights and Cleveland. Contingency plans are also on file with St. Alexis Hospital and with the local police department.
6. Pickle liquor shipments (dates and destination for disposal) are computerized from the manifests.
7. Waste pickle liquor only stored in one area. They can only store for a couple days maximum because of limited storage capacity.
8. This information is not kept in one Operating Record but is available through other management and accounting programs.
9. Tanks are coated with anticorrosion liners.
10. Only waste acids are stored here.
11. Decanter Tar Sludge (K087) is recycled back into the coke batteries along with nonhazardous paint sludges. The entity felt that this unit was not subject to any RCRA requirements as described in O and P. It is monitored by Cleveland Air Agency.
12. Entity filed as a storage facility but they do not have capacity to store for 90 days.
13. Waste Solvents (F001 and F003) are reclaimed on site from a distillation unit. The waste solvents are sent directly to the distillation unit and never stored for more than 90 days. It was not realized at the time of the inspection that waste solvents were reclaimed on site. Therefore, this storage area was not inspected. This information was obtained from Mr. Dale Papajsik during a phone conversation 4/20/81.